

STAFF REPORT
DATE: 12/12/2023
WORKSHOP DISCUSSION

TO: City Council
FROM: Nathan Fuerst, AICP, Consulting Planner
AGENDA ITEM: **Sketch Plan Review – Eberhard Property Proposal by Rachel Development**
REVIEWED BY: Sophia Jensen, City Planner
Jenni Faulkner, Senior Consulting Planner

BACKGROUND:

The City is in receipt of a Sketch Plan application from Rachel Development for the proposed Open Space development on an unaddressed property referred to as the Eberhard Property after the current ownership. The location is south and west of Stillwater Boulevard and Inwood Avenue. The proposal would consist of 65 single family residential units across nearly 80 acres of undeveloped agricultural land located off Inwood Avenue and abutting the City of Oakdale. The development is proposed to connect Imperial Ave N. in the existing neighborhood to the north. The proposal would have a community septic system (outside of the MUSA boundary) and be connected to city water.

A review of the concept plan and narrative supplied by the applicant is provided in the planning memo appended to this report. The details most important for this discussion are provided below.

ISSUE BEFORE THE CITY COUNCIL:

The City has not reviewed a proposal for an OS PUD in several years. Since PUD's recognize the uniqueness of a site and the proposed development, they have different considerations and conditions. The City Council should provide feedback regarding the sketch plan and advise Rachel Development on City preferences to move forward with the proposed development.

ENTITLEMENTS REQUIRED:

Staff have reviewed the concept level plan against the adopted 2040 Comprehensive Plan and the City's Zoning and Subdivision standards. The site is zoned Rural Residential (RR) allowing a density of .1 units per acre and guided Rural Single Family in the Comp Plan with a stated density range of .1 to 2.0 units per acre.

The following approvals will be required for this project to be permitted:

1. Open Space Planned Unit Development (OS PUD) – Provide flexibility to allow the Applicant to deviate from the City Code requirements of the base zoning district, Rural Single Family. The Applicant has requested greater flexibility than is allowed by the City's OS PUD ordinance (Chapter 105.12, Article 17) which must be approved by a supermajority (4/5^{ths}) vote.
2. Major Subdivision – Required by the City's ordinance to subdivide the property and allow for dedication of easements and Rights of Way.

FISCAL IMPACT:

There is no fiscal impact to the City at this time. The Applicant would be required to extend the public infrastructure serving the proposed development at their own expense. This sketch plat went to Parks Commission where they have recommended park dedication be satisfied with cash payment.

ANALYSIS:

City Staff have worked with the Applicant, Paul Robinson with Rachel Development, to review the requirements of the City's OS PUD ordinance. A previous version of this submittal was provided to the City with 42 units and therefore a smaller request for additional density. The Applicant has determined that the previous 42 unit proposal would not be financially feasible due to City requirements and has submitted a proposal of 65 residential units and a narrative describing the requested flexibility. A staff memo dated November 21, 2023 containing a detailed review of the resubmitted proposal has been provided to the Applicant and is appended to this Staff Report.

Of primary importance to the City Council is the request of the Applicant to deviate from standards in the OS PUD ordinance. Notably, by allowing more units than permitted by the OS PUD ordinance. The City Council can consider requests granting additional flexibility beyond that allowed its OS PUD ordinance by a supermajority or 4/5ths vote.

In meetings early in the concept planning process, City staff advised that the framework that would be used to assess a request for additional density would be the Density Bonus provisions in the City's Planned Unit Development (PUD) ordinance (Chapter 105.12, Article 18). This section was revised earlier in 2023 and provides a point-based system that allows an additional 1% beyond the development's allowed base density per amenity point (up to a maximum of 20%).

A schedule of Amenity Points as found in Code Section 105.12.1160 is copied below:

<i>Points</i>	<i>Amenity</i>	<i>Standards</i>
5--10	Single Family Stormwater Reuse Irrigation	Single family detached and single family attached residential developments. A minimum of 50 percent of the total area to be sodded and landscaped shall be irrigated by stormwater reuse systems. One amenity point shall be rewarded for every additional 10 percent of the total sodded and landscaped area that is irrigated by stormwater reuse. All stormwater reuse systems shall meet the requirements of the City of Lake Elmo Stormwater Reuse Irrigation Design Standards.
1--10	Renewable energy	A minimum of 10 percent of the total electricity usage shall be derived from renewable energy sources through onsite generation. One amenity point shall be rewarded for every additional 10 percent of the total electricity usage generated by onsite renewable energy source. The renewable energy site amenity may be used in conjunction with the Leadership in energy and environmental design site amenity.
10	Public right-of-way dedication	Dedication of land and construction of a public road, trail, pathway, or greenway that is part of an approved city plan, but outside the scope of the immediate project area. Right-of-way improvements should be designed per the specification of the city engineer.
5	Multifamily Stormwater Reuse Irrigation	Multifamily residential developments. 100 percent of the total area to be sodded and landscaped shall be irrigated with stormwater reuse systems. All stormwater reuse systems shall meet the requirements of the City of Lake Elmo Stormwater Reuse Irrigation Design Standards.
5	Fire sprinkler systems	The installation of fire sprinkler systems, per NFPA 13, 13D or 13R, in structures that are not currently required to install these systems under state code. Amenity points will only be awarded in situations where there are a significant proportion of structures in the development that are not required to be sprinkled under the state building code. In addition, the density bonus calculation shall only be applied to the number of structures that do not require fire sprinkler systems.
5	Leadership in energy and environmental design	The proposed development shall meet the minimum standards for LEED Silver certification. The developer must submit the LEED checklist and documentation to the City, approved by a LEED Accredited Professional (LEED-AP), which shows that the project meets LEED Certification.
1-3	Theming	Significant utilization of various elements of theming consistent with the 2013 Lake Elmo Theming Project, including, but are not limited to, signage, fencing, landscaping, lighting and site furnishings. One amenity point shall be rewarded for every integrated theming component. Each theming component must be incorporated along 100 percent of the proposed street to receive credit. A maximum of three credits shall be rewarded.
3	Natural features	Site planning that preserves significant natural features or restores ecological functions of a previously damaged natural environment when such preservation or restoration is not otherwise required. The preservation and restoration must be above and beyond that required by city ordinance or engineering standards to receive credit.

Additional amenity points can be issued by the City for amenities not in the table above.

The City Council will need to discuss the proposal and ultimately should provide guidance on whether there is support for the flexibility requested for the proposed development.

PLANNED UNIT DEVELOPMENT FLEXIBILITY:

The anticipated requests to deviate from City Code are summarized below:

- 65 units -vs. 34 units
 - Increased density from 34 unit (.45 units/net acre) to 65 units (0.86 units/net acre)
- Grass Trail vs Paved Trail
 - Substituting over 5,000 feet of grass trail for 3,425 feet of paved trail to meet and possibly exceed the required trail which is supposed to be a paved trail equivalent to the length of street.
- 50% impervious vs 25% Impervious
 - Do in large part to the smaller lot sizes we are asking for up to 50% of lot area to be impervious, as mentioned above even with this the overall site will only have 15% impervious.
- 50' Street Tree Spacing
 - Asking for trees every 50' which is the City's typical standard vs. 30'
- Landscaping Requirements Five 1.5" Landscaping Trees per Lot vs. ten.
 - Asking to reduce landscaping standard to five 1.5" trees per lot vs ten 1.5" trees per lot and to allow substituting larger caliper trees for smaller. For example, 3" would be the equivalent to two 1.5" trees.
- 10' Side yard set-back
 - 10' side yard vs 15' side yard – Lot width is 70'
 - NOTE: The code requires the side yard to be 10% of the lot width and does not set a minimum. We likely meet the code here depending on your interpretation of the code.
- 11,200 sf Minimum Lot Size
 - Reduce lot size from 21,780 sf to 11,200 sf.
- Allow 3:1 or flatter slopes
 - Clarify that for this OP-PUD steep slopes are slopes in excess of 3:1.
- 28' Wide Roadway (no parking one side) vs 32' Wide Roadway
- Use of PVC vs Ductile Iron Watermain
 - We understand the City has typically used ductile iron pipe. The majority of cities are now using PVC for many reasons. One important one in the current market environment is that it is significantly less expensive but it is also in many ways structurally superior.
- 2 ac Homestead Parcel
 - Allowance to create a homestead parcel with its own rules, 20' setbacks all around and private septic. This homestead parcel would then be sold separately and not be part of the subdivision.

PLANNED UNIT DEVELOPMENT BENEFITS:

- OS PUD will provide 50% open space preserved in perpetuity.
- The development will restore a significant amount of the open space from tilled, agricultural land to a mix of prairie and wooded areas.
- The development will have a community septic system.

- The proposed development will be connected to city water and would make planned roadway connections.
- Walking trails will be provided for use by future residents and maintained by the HOA.

FEEDBACK DESIRED:

The following questions are posed to provide feedback requested by the Applicant:

- Is the development consistent with the intent of the Open Space Planned Unit Development ordinance?
- Is the City Council supportive of the request for additional density? If so, is the Council supportive flexibility within the OS PUD without amenity points being considered?
- What types of flexibility from the Zoning ordinance will the City Council be willing to support? Which flexibility wouldn't be supported?
- Water appropriations have been a topic recently discussed by the City Council. Under what circumstances might the City make a determination that the subdivision is premature?

ATTACHMENTS:

- Proposed concept plan and narrative
- 11/24/23 - Planning Comment Memo – Sketch Plan Review
- 11/30/23 - City Engineering Comment Memo
- 11/30/23 - Washington County Comments
- 10/3/23 - Assistant Fire Chief Comments
- 10/10/23 - Valley Branch Watershed District Comments

2298 Inwood Ave N – Sketch Plan Narrative

To: City of Lake Elmo

From: Rachel Development, Paul Robinson – Development Director

Date: 11/17/23

A - Submittal Documents:

1. This Narrative
2. Sketch Plan & Exhibits
3. Concept Landscaping/Theming Sketches
4. Letter from Washington County
5. Wetland Delineation Report
6. Notice of Decision - Wetland Delineation - Valley Branch Watershed District
7. Soil Boring Report

B - Development Property:



- Owner
 - Caroline M Eberhard Trust - Allan Eberhard is the Trustee.
- Applicant
 - Rachel Development – Paul Robinson, Development Director
- Property
 - Address – 2298 Inwood Ave N, Lake Elmo Mn 55042
 - Current Zoning – Rural Residential (RR)
 - Current Zoning/Uses Around Property – see below
 - Current Land Use Plan Guiding – Rural Single Family (RSF)

C - Introduction:

Thank you in advance for reviewing our sketch plan submittal. Over the past 10 years Rachel Development has developed over 5,000 units in and around the Twin Cities. We develop single family residential neighborhoods that range from large lot single family to townhomes as well as develop and build other residential products including apartments, senior living and memory care facilities.



Our goal with the property at 2298 Inwood is to use the OP-PUD zoning district as a guide to create a conservation subdivision. Over my career I have been a part of several conservation subdivision developments including Wild Meadows in Medina, Locust Hills in Wayzata and Woodland Cove in Minnetrista to name a few. My experience with conservation developments dates back to my time as City Administrator of Medina when, as coincidence may have it, I took the city council and planning commission on a tour of Fields of St. Croix which ultimately led to the adoption of a PUD conservation ordinance and then ultimately to the development of Wild Meadows.

We believe our plans for this property, which follow the essence of the OP-PUD zoning, will create a beautiful neighborhood that will take what is and has been primarily a row crop farm and transform it into a neighborhood surrounded by open space with robust native vegetation. This will include areas of mesic and wet prairies, and oak savannah intermixed with wildflower drifts or more.

D - Property Facts

- Gross Acres 78.24
- Wetlands Acres (2.58)
- Net Acres 75.66

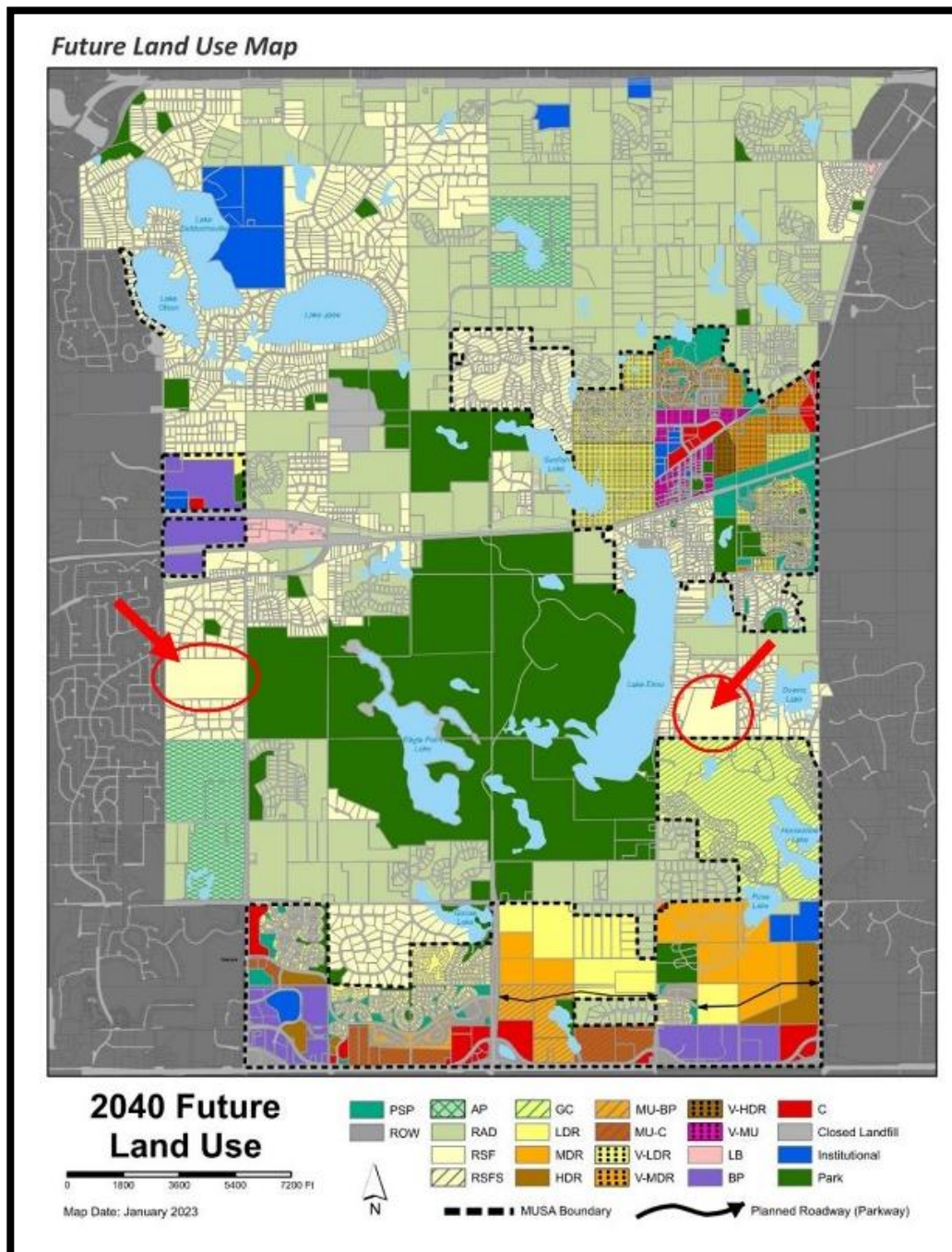
E - Property Zoning and Comprehensive Plan Guiding

The Eberhard property is guided Rural Single Family (RSF). As we understand it, the 2040 Comprehensive Plan merged the Residential Estates (RE) areas with the Rural Single Family (RS) areas into the RSF guiding. This change allowed properties with this guiding to have some additional density.

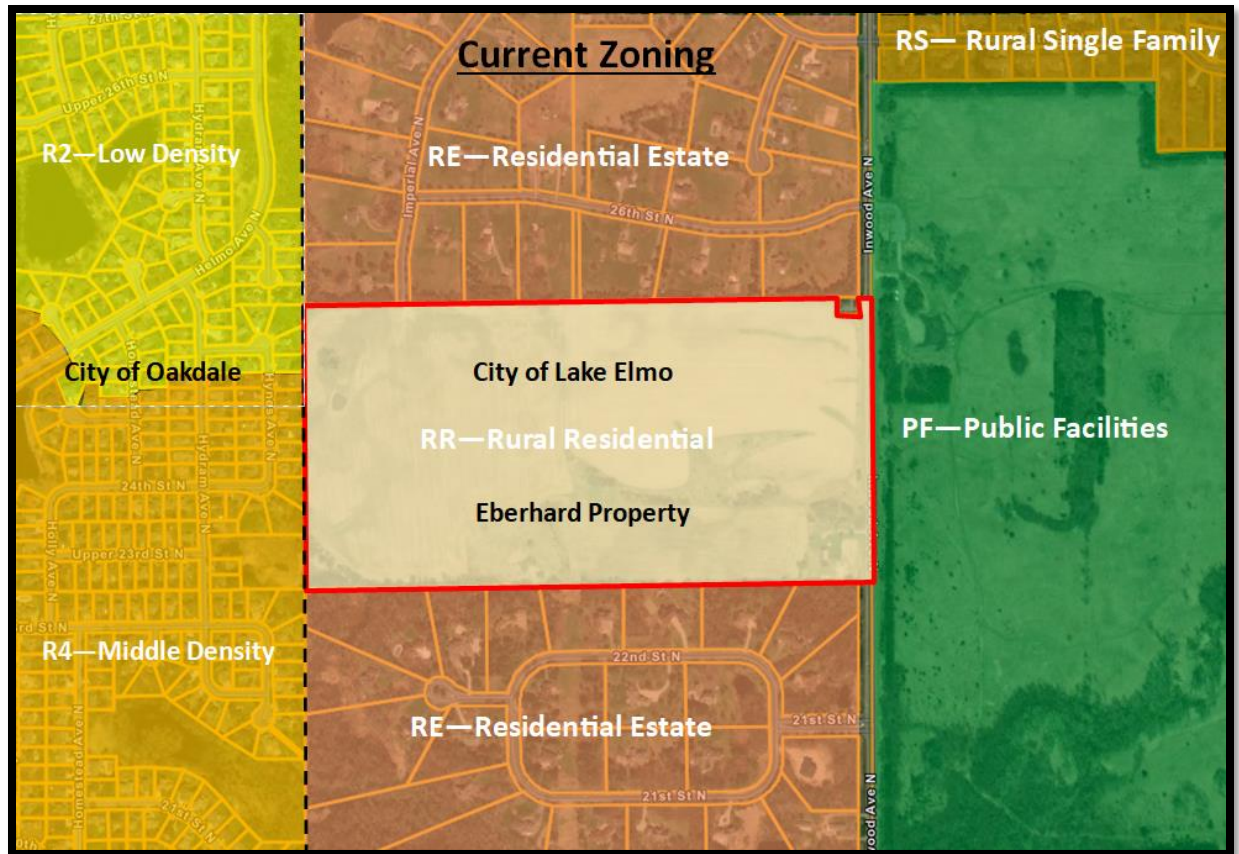


The stated density range for RSF is 0.1 units per acre to 2 units per acre. I am jumping ahead here but our proposal is 0.86 units per acre, well within that density range.

There are only two properties in the City that could take advantage of the RSF guiding that are 20 acres or greater as required by the OP-PUD code. These properties are highlighted below. One is the Eberhard property and the other is owned by Mary Durand Trust.



The current zoning of the property is Rural Residential. Adjacent zoning districts are typically all higher density single family districts than Rural Residential.



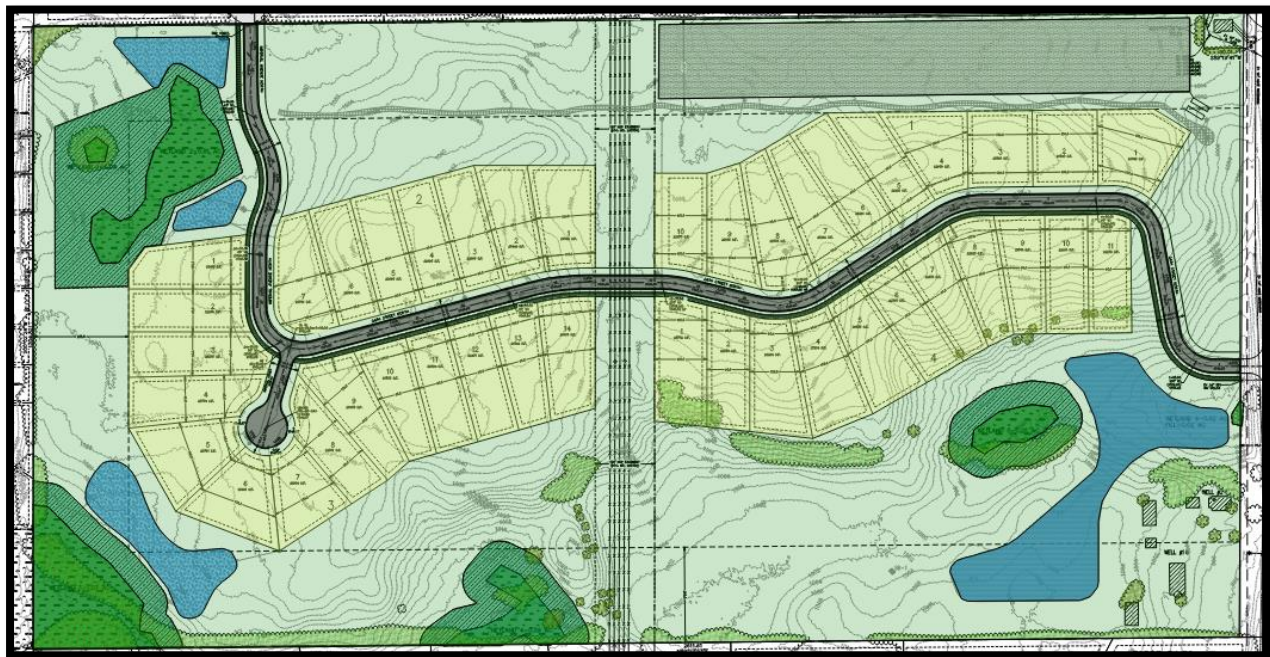
- To the North
 - Residential Estate Zoning (RE) - Single family large lot development, generally 2.5 acre lots.
- To South
 - Residential Estate Zoning (RE) - Single family large lot development, generally 2.5 acre lots.
- To East
 - Public Facilities Zoning – 2,165 acre Lake Elmo Regional Park
 - Residential Single Family (RS) - To Northeast, generally 1.5 acre lots.
- To West
 - Suburban density residential development, generally 1/4 - 1/5 acre lots

F - Submittal History

Before describing our current plan in detail, I wanted to provide some background on how we got to the plan before you. On September 22, 2023, we submitted a sketch plan to the City for an Open Space Preserve (OP) development on the 78 acre Eberhard property.

That plan included 42 units (35 plus a 20% bonus). At the time we submitted our initial concept plan we were still working through our due diligence work including wetlands, soils, septic design, and cost analysis etc. We submitted our sketch plan early in order to get some initial feedback from City staff and Consultants and to allow us to keep on a timeline that was in part required by the land seller.

Below is that sketch plan.



This plan included 42 half acre lots and assumed that we would qualify for the 20% PUD bonus.

We received a very thorough staff review from both the Planning and Engineering departments which helped us put together a detailed cost estimate for the project. What we found was that even if the Seller gave us the property, we would not be able to successfully complete an OP development plan with 42 units. This is likely why the City has not approved a development using OP zoning since 2006.

Please note that we also learned that the City deducts wetlands from gross acres to determine density so the density of our submittal should have been 34 for the base and 41 with a 20% bonus if our initial submittal was to have met the letter of the OP and PUD codes.

Our intent with this initial sketch plan submittal was to meet or come as close as possible to meeting all of the City codes and rules including but not limited to those in the OP zoning district and PUD overlay.

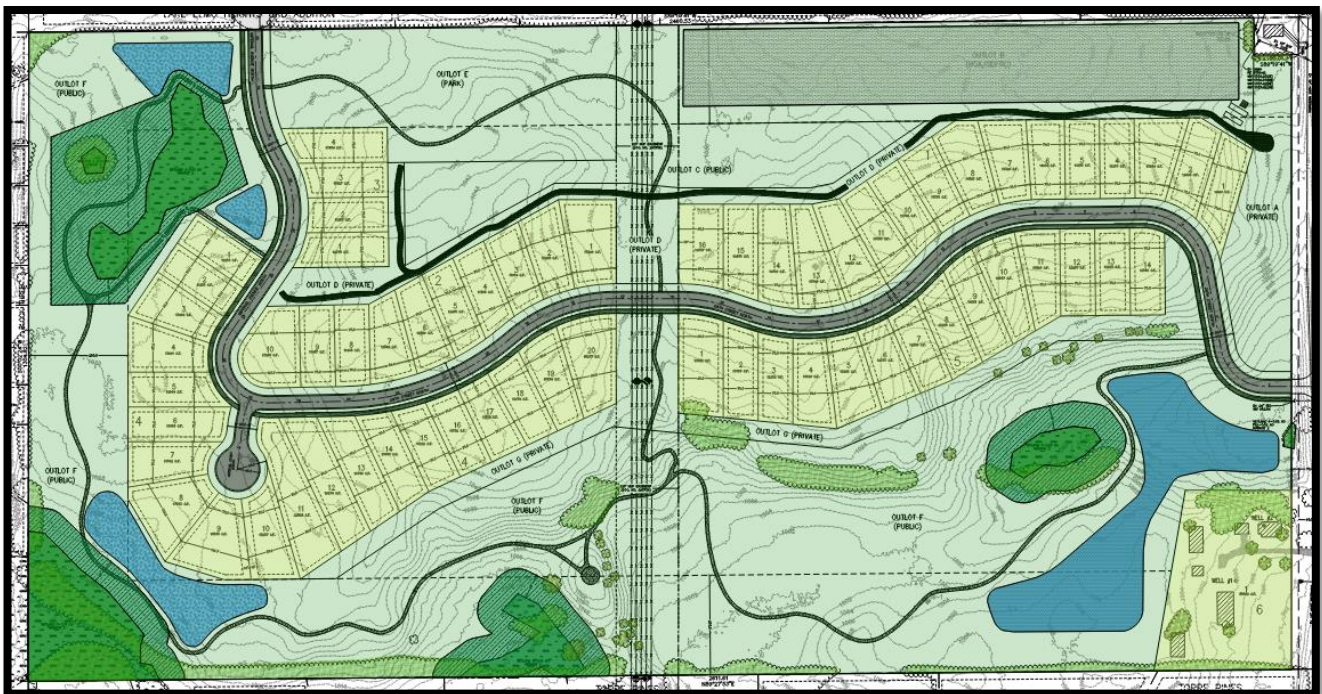
We believe that the 42 Lot plan did meet the intent of the OP zoning. We kept over 60% of the property in open space, fit the lots into the natural landscape of the property, created a community septic treatment system, a water reuse system for irrigation, plans to restore all of the open space, provide trails, etc. We felt very good about the plan until we realized that there was no way to pay for the project with the revenues we could generate from 42 lots.

So, after we met with staff, we looked at what it would take to get a project to work financially and yet keep as many of the OP goals intact. What we came up with is a 65 unit project that

- preserves a 200' buffer around the property (except for the homestead lot – home is still over 200' from property line),
- provides over 60% open space, and
- stays within the same basic footprint as the 42 lot plan.

G - Development Plan

65 Lot OP-PUD Plan



The tables below provide basic information about the property. You will see that the site is 78.24 gross acres and while our neighborhood plan includes 65 homesites it maintains over 60% open space and a net density of 0.86 units/ net acre.

- **Area/Unit Information**

Units	65*	
Net Density	0.86 units/net acre	
Gross Density	0.83 units/acre	
Open Space	49 ac	63 %
Right of Way	7 ac	9 %
Lotted Area	22 ac	28 %

- 2 ac Homestead lot plus 64 OP lots

- **Lot Information***

Lot Minimums*

Area	11,200 sf
Width(setback)	70'
Depth	160'

- Except homestead lot which has 2 acres of lot area.

Lot Set-backs*

Front	30'
Side	10'
Side (Street)	30'
Rear	20'

- Except homestead lot which, due to existing structures, has 20' setbacks – side, front, rear.

H – Open Space Preserve (OP) PUD Flexibility

Within this narrative we are asking for a number of flexibilities to the OP code. These are summarized at the end of the narrative. We are not trying to show bonus points or come up with a specific calculation to justify our request. What we are doing is trying, the best we can, to make a case that we are meeting the intent of the code and comprehensive plan. For these flexibilities we understand that the OP code will require a super majority vote of the City Council (code provision shown below). That is why we are providing a more detailed plan and narrative to get the best indication that we can if there is enough Council support for our request.

Open space PUDs shall comply with all of the following development standards unless modifications are authorized for consideration by the city council via a super-majority vote.

I - Property Characteristics/Background

- **Wetlands**

- Wetland Delineation - Within the past year a wetland delineation was processed and approved by a previous developer. We have purchased the rights to this report. This delineation report identified 6 wetlands; these are shown on our sketch plan.
- MNRAM & Buffers– We have completed a Minnesota Routine Assessment Method for Wetlands (MnRAM) to determine the quality of the wetlands. This report was approved by the Valley Branch Water Watershed District (VBWD) and all wetlands on the property were identified as Management 2. Management 2 wetlands in the VBWD require a 50' buffer. Buffer averaging is allowed and is shown on the Sketch Plan. Buffer averaging allows for a minimum buffer of 25' so long as the total area of buffer is the same as if it were all 50'. As a part of our restoration plan, we will be planting the wetland buffers with native seed.
- Wetland Impacts – Our sketch plan assumes filling Wetland 6. Wetland 6 is 872 sf in size. This impact qualifies as a de-minimus impact and will be processed accordingly. Filling this wetland is being driven in part by the requested location for access to the site from CR 13 by Washington County and by the need for ponding in this location.

- **Soils**

- Soil Borings – Included in our submittal is a soil boring report done by Haugo Geotechnical services. This was done for a previous developer but we have, similar to the wetland report, purchased the rights to this report. We also hired Braun Intertec to conduct some additional borings. These reports were provided to the City. In general, the soils on the Eberhard property are suitable to support housing. There was one boring that found, what Braun has characterized as glacial slopewash or native organic soil, buried approximately 20' deep. This is currently not near any of the homesites planned within the development.

- **Karst**

- The watershed has pointed out that there is an indication that there could be some Karst features on or near this property. We have Braun Intertec studying this issue. To date the nearest Karst formation that has actually been identified in or near Lake Elmo is several miles to the east of this property.

- **Tree Inventory**

- We have completed a tree inventory. 78 total trees and 45 qualifying trees were identified. Their locations and numbers are shown on our plans. We believe we will likely meet or be below 30% removal threshold required by the City's Tree Preservation code.

- **Wells**
 - There are two known wells on the property. Both are shown on the plans. Well #1 has been sealed and Well # 2 will be appropriately sealed as a part of our development work.
- **Slope Analysis**
 - A slope analysis was included within our sketch plan submittal. We are designing our plan in a way to best work within the existing topography while creating beautiful marketable homesites. No slopes on the lots will exceed 3:1.
- **County Road 13**
 - Included in our submittal is a letter from Washington County containing their initial review of our first concept (different from the sketch plan you are now reviewing). Their comments in summary are:
 - Ideally place the CR 13 access near the center of the property – center location shown on plans
 - Show trail access to CR 13 on the plans – Shown on plans
 - They will require full turn lanes from CR 13 – bypass currently shown on plans
 - We will need access and utility permits – will complete with final construction plans
- **Powerline Easement**
 - As you can see on the aerial included on the first page there are Xcel Energy Power lines that bifurcate the property. These are located in a 125' easement as shown on the plans. We are in communication with Xcel Energy on what can and cannot be done within the easement area. As you may note on our sketch plans, we will need to be able to install a roadway, utilities, grade and ideally install some landscaping within the easement area.

J - Development Plan Details

- **Lot Sizes and Setbacks**
 - The homesites themselves have been kept smaller and the setbacks are generally consistent with the OP zoning. Reducing the lot sizes provided the additional density needed to make this project possible while keeping the development footprint small staying true to the intent of the OP-PUD.
- **Landscaping/Theming/Amenities**
 - Overall Landscaping – In general we are planning to have nicely landscaped entry features, a monument along with white fencing in select locations to accentuate the rural character. Sketches of these plans have been included in our submittal.

- Site Restoration – Since a majority of the site is farmland, the primary amenity we are creating is the restoration of the open space back to native vegetation. We are working with Minnesota Native Landscapes on a restoration plan for all of the open space areas on the site. This will include but is not limited to plantings for...
 - Short & tall grass prairies including Oak Savannahs
 - Mesic prairie
 - Native drifts designed for pollinators in both dry and wet areas
 - A butterfly garden
 - Wet meadows
- Street Trees – 133 street trees are shown on the plans. That is, in general, one street tree for every 50' of roadway frontage except for the area within the powerline easement where trees are not allowed. While we understand that the OP code calls for street trees every 30' we believe this is not practical with the layout we are proposing and adds additional cost that does not add to the rural character of the development and takes away from other ways to add amenity value to the neighborhood.
- Open Space Trees – Over 320 landscaping trees are shown on the plans. The number of trees was determined by multiplying 5 trees times the number of lots. We are requesting flexibility here. The OP code would require 10 trees per lot. In large part we believe that planting over 300 trees will be more than sufficient in conjunction with the other requirements and goals of the OP code that we are meeting. This is four times the numbers of trees currently on the property. Some of these trees shown in the open space may be included within the individual lots on a future plan. This number of trees is basically the same number of trees that would have been required with a more typical OP-PUD plan.
- Mailboxes – The cluster mailboxes will also be designed to fit within the theme of the property yet be durable.
- Trails – We are proposing an 8' trail along the roadway through the neighborhood instead of a sidewalk. We expect this will be used by the residents of the neighborhood as well as those of adjoining neighborhoods. We are also including over 5,000' of grass trails through and around the restoration areas on the site as a substitute to the 3,400' of paved trail that would typically be required by the OP-PUD (OP Code requires a paved trail equivalent in length to the length of roadway within the development). The trail systems will include themed bird feeders, pedestrian nodes with informal boulder seating, an overlook, and interpretive signage identifying the flora and fauna that the residents are experiencing. We are currently identifying the grass trails as private unless the City is interested in them being public.

There is a shoulder trail along CR 13. We expect to maintain that same trail location. The County and City have both told us they have no other trail plans along CR 13 other than what is currently being provided by the shoulder trail.

- Streetlights – We understand the City has a street light standard. We may want to include a more dark sky compliant streetlight to fit a more conservation minded theme. That said we do not have one to share at this time.
- Homeowner's Association – The intention for this neighborhood is that the HOA maintain the lawns and landscaping and remove snow among the other items such as maintain the community septic, restoration areas and water reuse system.
- **Declarations and Architectural Controls**
 - With our future approvals we will be including declarations and architectural guidelines that will help ensure that the homes built in this neighborhood are high quality homes with a focus on architectural detailing. Examples of these homes are provided later in this narrative.
- **Conservation Easement**
 - For an open space development, we have been told that the City prefers that a 501 C3 organization holds the easement. We have spoken with the Mn Land Trust, but they are not interested in holding an easement in this development. The OP code does indicate that the City could hold the easement. We would appreciate talking with the City about ways to accomplish protecting and maintaining the conservation areas with the OP developments.

Your code requires the Declarations in each OP neighborhood to include a provision allowing the City to assess the HOA in the case that the HOA is not maintaining the open space. This would appear to give the City some protection to enforce easement provisions where the City holds the easement.

Another way we have done this is to have the Homeowner's Association (HOA) hold the easement but include in the easement a requirement that the HOA provide the City with an annual inspection report done by a qualified third party approved by the City and the HOA. In a previous project we used an ecologist working for Kjolhaug Environmental to do the reports. If the report identifies issues needing attention the HOA must complete the repairs within a specific timeframe. If not done within that timeframe the City has a special taxing district set up for the neighborhood which allows the City to tax the residents for the required work. I am not sure which is better, the assessment route or the taxing route. As stated, cities have used the Special Taxing District route in two of my previous developments. In both instances the special taxing districts were set up by Kennedy and Graven.

Again, we have asked the most likely organization if they would hold the conservation easement and they are not interested. We would like to know if the City will step in and hold the easement or allow the HOA to hold the easement if we cannot find another suitable organization. We would prefer to know this prior to moving forward with the Preliminary Plat.

- **Builder/Homes/Architecture**

- The primary builder of this neighborhood will be Charles Cudd Co. We may include another luxury villa homebuilder to join Charles Cudd Co but have not yet made that determination. Charles Cudd Co has built a number of homes in Lake Elmo over the years including in Clover Dale Farms as well as nearby in West Lakeland Township in Wyndstone, Waterford, and Waterford East.

- Below is an example of the streetscape using Charles Cudd Homes



- Below are some photo examples of Charles Cudd Villa homes. Not all these examples will be built within this neighborhood but are representative of the type and quality of the homes.



- **Impervious**

- A typical OP-PUD limits impervious surfaces to 25% of the lot area including streets and trails. We are unsure of the reason for this stricter standard since over 50% of the property will be deep rooted prairie open space and water running off from the impervious surfaces will be treated within the storm water ponds. That said since our lots are smaller there will be a need for a higher percentage of impervious. We are asking for an allowance of up to 50% impervious on the homesites. While some lots will need up to 50% impervious, most lots will likely need less. Below is a table with hard cover examples based on models that Charles Cudd is planning to build within the neighborhood. These are modest sized homes in the luxury villa category. You will see that without a pool most lots, not all, will be able to accommodate the largest of the planned Cudd home models. If a customer wants a pool, the size of the pool deck could eliminate some of the smaller homesites. We are ok that not all lots will accommodate a pool we are trying to be fair with our comparisons and examples. Without a pool most lots work with most models. Still there are some lots where 50% may not work for certain models and just like the example with the pools compromises will need to be made or customers who want larger homes will need to look to the larger lots. The examples below are conservative. We believe that when all is said and done the overall hardcover of the property including sidewalks and roads will be under 15%.

Impervious Examples

		Bennington		Willow		Coventry	
		<u>High</u>	<u>Low</u>	<u>High</u>	<u>Low</u>	<u>High</u>	<u>Low</u>
	Driveway	1,500	950	1,500	950	1,500	900
	Home	2,350	2,350	1,900	1,900	2,330	2,330
	Garage	975	975	990	990	850	850
	Entry						
	Sidewalk	160	60	120	90	125	70
	Patio	1,000	300	1,000	300	1,000	300
	Total	5,985	4,635	5,510	4,230	5,805	4,450
Smallest Lot	11,300	53%	41%	49%	38%	52%	40%
Average Lot	13,692	44%	34%	40%	31%	42%	33%
	Pool Deck	1,200	1,000	1,200	1,000	1,200	1,000
	Total	7,186	5,636	6,711	5,231	7,006	5,451
Smallest Lot	11,300	64%	50%	60%	47%	63%	49%
Average Lot	13,692	52%	41%	49%	38%	51%	40%

- **City Water Issues**

- We understand that the Council has recently tabled a development application due to the legal issues related to the City's water allocation permit. Since the City Engineer has requested that we use City water within our development we have no choice at this point but to wait for the City to resolve its water issues or for the City to decide to allocate additional water units despite the DNR and others. That said, we would still like an indication of support from the Council.
- If there is support for our development plan, we would like to request that the Council consider letting us move forward with a preliminary plat and if our plat is acceptable that it could be approved contingent on the City resolving its water allocation issues with the DNR and that our plat not expire until 1 year after allocations of water resume. This will help us move forward with a preliminary plat now knowing that we will eventually be able to move forward with our development plans for the Eberhard property.

K - Development Standards/Infrastructure/Other

- **Roadway Width** – OP code states that streets shall comply with the engineering standards. The engineering standards have street standards listed in multiple locations. Both seem to indicate that a 28' wide residential roadway is acceptable. Excerpt from engineering standard included below.
 - *Minimum Street Widths, Measured from Face of Curb to Face of Curb (F-F)*
 - *New Local Residential Streets (with parking on both sides) - 32-feet F-F*
 - *Local Residential Street (when parking is allowed on one-side) - 28-feet F-F*
 - *Minimum Right-of-way Widths*
 - *Local Multi-Family Residential Street (32 feet wide) - 66-feet ROW*
 - *Local Single Family or Twinhome Residential Street (28-feet wide) - 60-feet ROW*

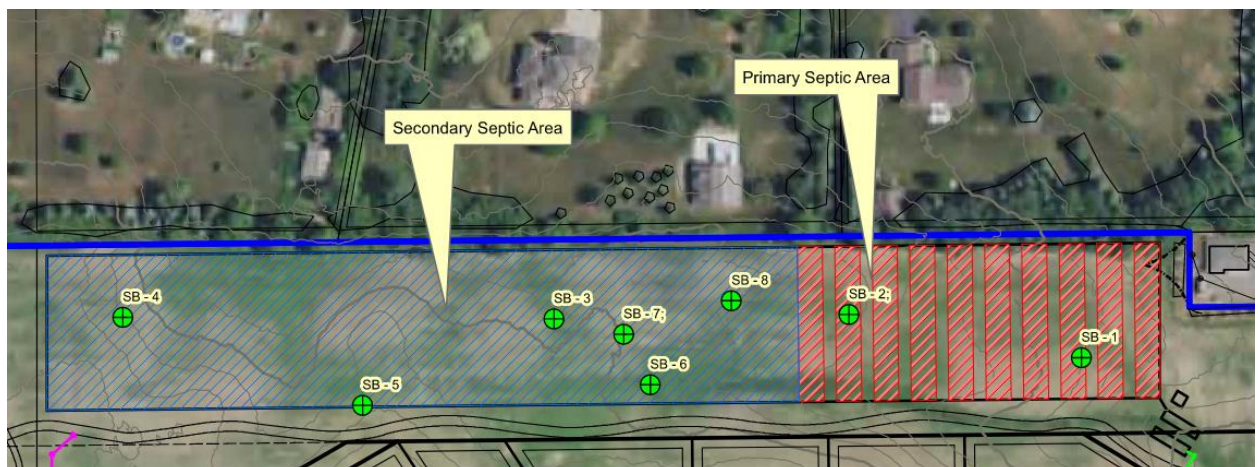
There is also a section in the engineering standards on Low Impact Design Practices. This section encourages the use of:

- Open Space Developments (Such as the OP-PUD)
- Narrow streets (Like the 28' Standard)
- Stormwater reuse (Which we are including)
- Vegetated Swales (which we are also using to convey water across the site)

Since we are using a conservation design it would seem appropriate to also use other low impact design practices such as narrower roadways as identified in the Engineering Standards. We believe that there will be sufficient parking with one-sided parking. I have successfully installed 28' wide roadways with one sided parking in areas with similar and smaller lots. One

recent relatively close example is a project called Eastbrooke in Cottage Grove. Therefore, we request to be able to install a 28' F' to F (29' B to B) roadway.

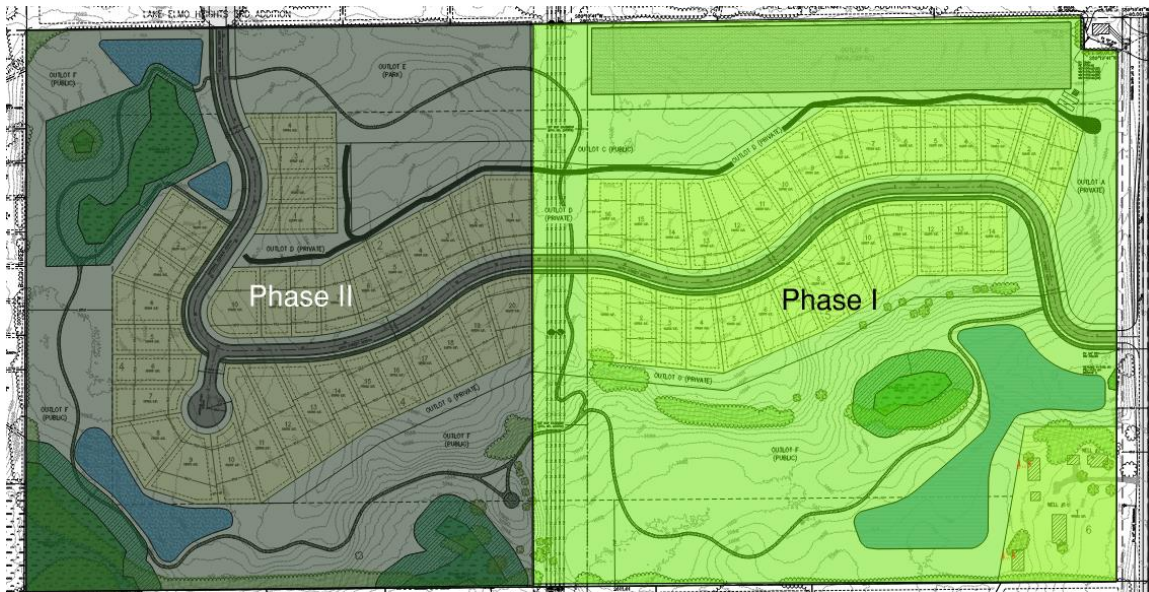
- **Stormwater Reuse** – We are proposing a stormwater reuse system that will be installed to irrigate 100% of the sodded and landscaped areas on the lots. We have previously installed these types of systems with success in other developments.
- **Sanitary Sewer - Community Septic** – We have completed soil probes, test pits to identify the location for a community septic system. Systems today are like package plants they include tanks called Sequencing Batch Reactors (SBR's) that basically function as a sewage treatment plant. They of course need regular maintenance including removal of sludge which will be part of the regular system of maintenance paid for and monitored by the Homeowners Association. The sewage from the homes will flow to the SBR tanks in pipes via gravity much like a typical City sewer system. An initial schematic drawing of the community septic system is shown below and our sketch plan shows a conceptual sewer line.



- **Water** – A conceptual watermain is also shown on our plans this will provide City water to the homes in this neighborhood. We will be connecting to the 8" watermain in Lake Elmo Heights 3rd Addition neighborhood on Imperial Ave N and also make a connection to the 16" high pressure line that runs along Inwood. The Inwood connection will also require a pressure reducing valve.

- **Phasing**

- We will likely need to develop this neighborhood in two phases from east to west as shown below. The first phase includes the communal septic system and water reuse pond.



L - Summary

- **Items consistent with OP-PUD code, engineering standards, or staff directives:**
 - 200' open space buffer (no lotted area included in buffer, except for homestead lot)
 - 50% open space (actual over 60%)
 - Set-Backs – Front 30', Rear 20', Side greater than 10% of lot width
 - Community Septic System
 - Storm Water Reuse System
 - Wetland Buffers (Manage 2 = 50' Buffer Averaging)
 - Theming – Entry monuments, fencing and other landscaping and decorative features
 - Enhanced restoration of 100% of the open space
 - Conservation Easements – Held by HOA with City Oversight or held by City.
 - No wetland buffer within lotted areas
 - Providing city water vs. private wells
 - Site layout works with existing topography of the site
 - Open space provided in 5 ac or greater contiguous parcels

- **Flexibilities requested to OP-PUD Code/City Standards**
 - 65 units -vs. 34 units
 - Increased density from 34 unit (.45 units/net acre) to 65 units (0.86 units/net acre)
 - Grass Trail vs Paved Trail
 - Substituting over 5,000 feet of grass trail for 3,425 feet of paved trail to meet and possibly exceed the required trail which is supposed to be a paved trail equivalent to the length of street.
 - 50% impervious vs 25% Impervious
 - Do in large part to the smaller lot sizes we are asking for up to 50% of lot area to be impervious, as mentioned above even with this the overall site will only have 15% impervious.
 - 50' Street Tree Spacing
 - Asking for trees every 50' which is the City's typical standard vs. 30'
 - Landscaping Requirements Five 1.5" Landscaping Trees per Lot vs. ten.
 - Asking to reduce landscaping standard to five 1.5" trees per lot vs ten 1.5" trees per lot and to allow substituting larger caliper trees for smaller. For example, 3" would be the equivalent to two 1.5" trees.
 - 10' Side yard set-back
 - 10' side yard vs 15' side yard – Lot width is 70'
 - NOTE: The code requires the side yard to be 10% of the lot width and does not set a minimum. We likely meet the code here depending on your interpretation of the code.
 - 11,200 sf Minimum Lot Size
 - Reduce lot size from 21,780 sf to 11,200 sf.
 - Allow 3:1 or flatter slopes
 - Clarify that for this OP-PUD steep slopes are slopes in excess of 3:1.
 - 28' Wide Roadway (no parking one side) vs 32' Wide Roadway
 - Use of PVC vs Ductile Iron Watermain
 - We understand the City has typically used ductile iron pipe. The majority of cities are now using PVC for many reasons. One important one in the current market environment is that it is significantly less expensive but it is also in many ways structurally superior.
 - 2 ac Homestead Parcel
 - Allowance to create a homestead parcel with its own rules, 20' setbacks all around and private septic. This homestead parcel would then be sold separately and not be part of the subdivision.

M - Closing

- We believe that OP-PUD plan we are proposing meets the intent of the OP-PUD code as well the goals of the comprehensive plan for properties in the rural areas of the City especially ones with RSF guiding. It does that by
 - Providing over 60% of the property in open space and placing it in a conservation easement
 - Restoring the open space from what is today 80% corn and soybeans to native prairie
 - Buffering the site from surrounding development by 200' – No other OP development has ever done this. While the buffer is 200' the distance from our homes and the nearest homes will be greater than a football field.
 - Treating storm water including the use of a water reuse system to lower the burden on the City water system by reducing the amount of good, treated water that is used to water lawns.
 - Providing trails, landscaping and theming to make this neighborhood different and special.

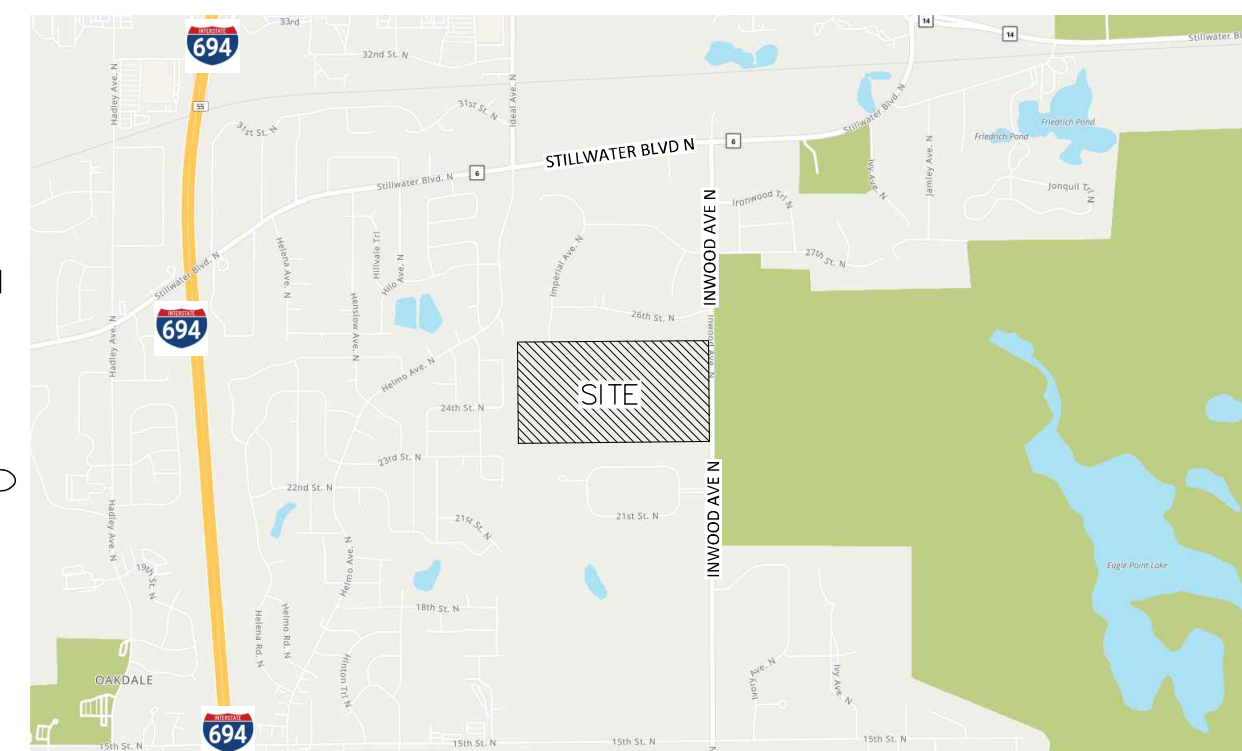
As noted above we started with an OP plan that would have more closely met the initial intended density of the zoning district. Well, times have changed, costs have gone up, regulation has increased and it is no longer possible to create a plan with that density that also provides sewer and water service, urban roads, theming, a complete restoration of the open space and more. What we are proposing is a modern OP plan that meets the goals of the OP but includes enough units to cover the additional development costs of meeting those goals.

This property has been in the family for over 100 years. They are now ready to sell and have tried unsuccessfully to sell/develop their property. The landowners have made concessions to help us get this to a point where we have a plan that we believe can succeed. We believe our development plan will create a beautiful neighborhood, one of the more sought after neighborhoods in this City.

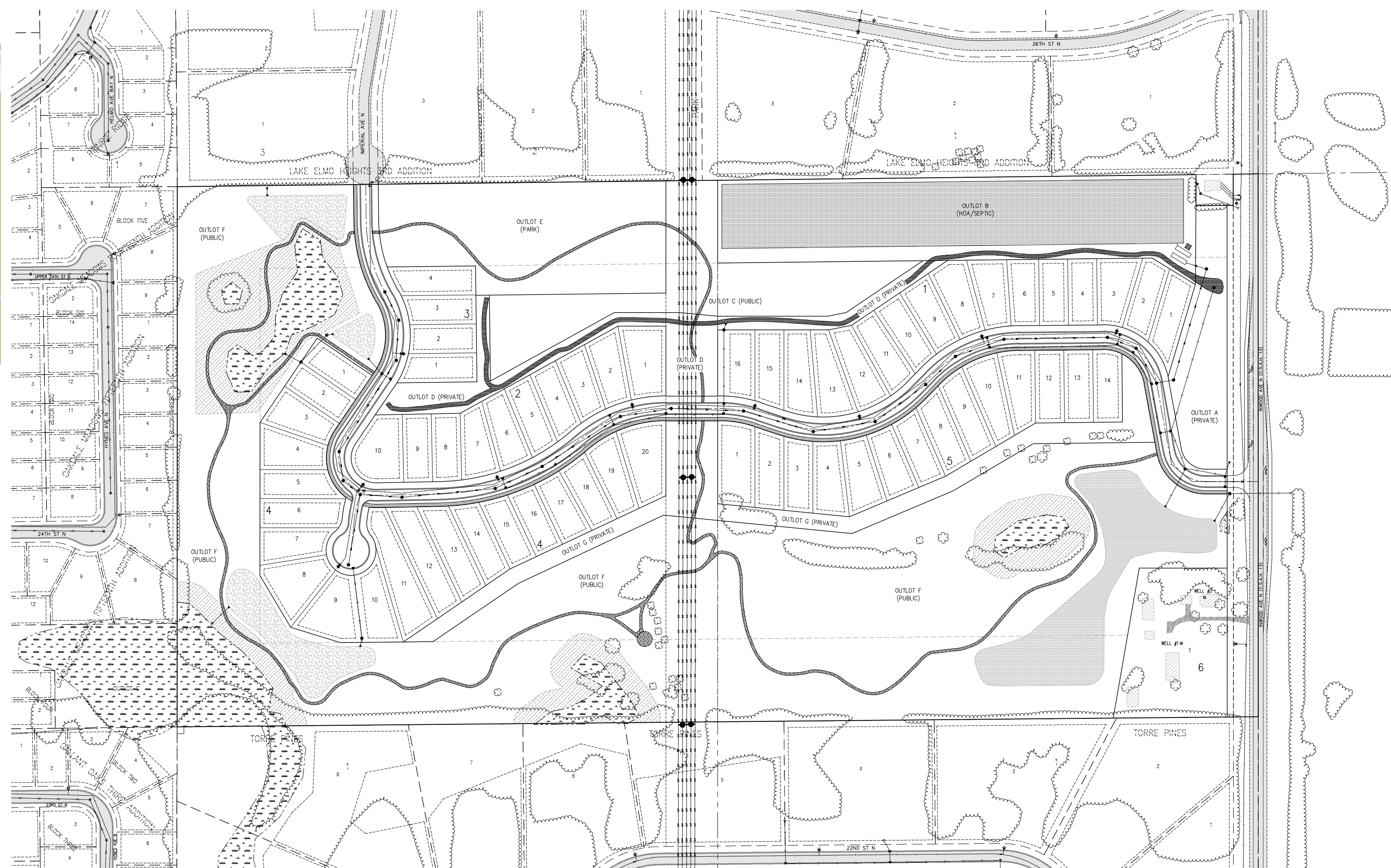
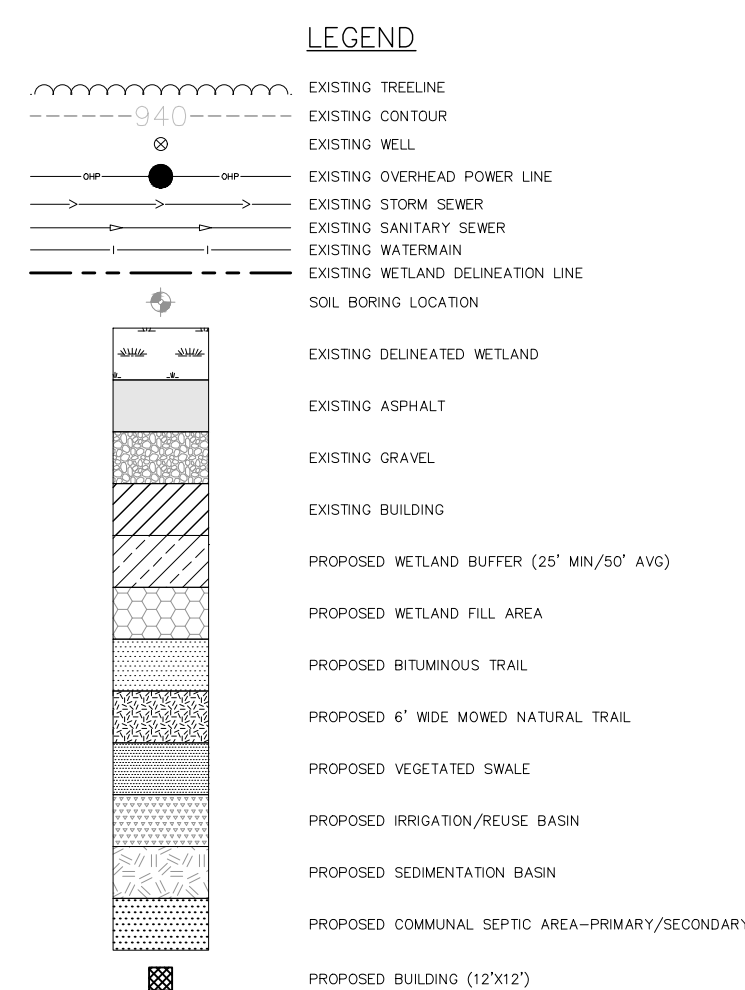
We look forward to talking with you at your December City Council work session and hope we can together create the first Open Space Development in almost two decades in the City.

EBERHARD PROPERTY—2298 INWOOD AVENUE N.
LAKE ELMO, MINNESOTA
SKETCH PLAN/PUD EXHIBITS

FOR
RACHEL DEVELOPMENT
4180 NAPIER COURT NE, ST. MICHAEL, MN 55376
PHONE: (763) 488-9650
EMAIL: PRobinson@racheldevelopment.com

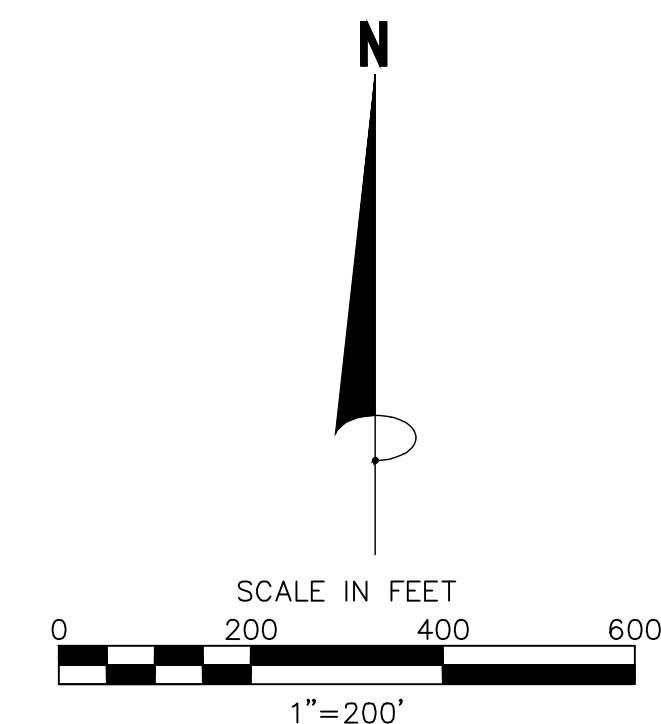


LOCATION MAP
NOT TO SCALE



INDEX

TITLE SHEET	1.00
SKETCH/PUD PLAN	2.00-2.01
AERIAL EXHIBIT	3.00
KARST/SLOPE ANALYSIS/TREE EXHIBIT	4.00



SITE ADDRESS

2298 INWOOD AVENUE N., LAKE ELMO, MN

SITE AREA – 78.24 ACRES

PROJECT CONTACTS

PROJECT ENGINEER:	KURT QUAINANCE, P.E. – JAMES R. HILL, INC.	(952)–890–6044 (O) (612)–508–8890 (M)	KQUAINANCE@JRHINC.COM
PROJECT SURVEYOR:	MARCUS HAMPTON, LS – JAMES R. HILL, INC.	(952)–426–4736 (O)	MHAMPTON@JRHINC.COM
DEVELOPER:	PAUL ROBINSON – RACHEL DEVELOPMENT	(763)–488–9650 (O)	PROBINSON@RACHELDEVELOPMENT.COM

James R. Hill, Inc.
PLANNERS / ENGINEERS / SURVEYORS
2999 W. CTRY. RD. 42, SUITE 100, BURNSVILLE, MN 55306
PHONE: (952)890-6044 FAX: (952)890-6244

hereby certify that this plan, specification or report was prepared by me or under my direct supervision and that I am a duly Licensed Professional Engineer under the laws of the State of Minnesota.

**WEBERHARD PROPERTY-2298 INWOOD AVENUE N.
LAKE ELMO, MINNESOTA**

TITLE SHEET

FOR

RACHEL DEVELOPMENT

4180. INAPIER, COURT NE ST. MICHAEL, MN. 55376

DRAWN BY
CJK

DATE
9/22/23

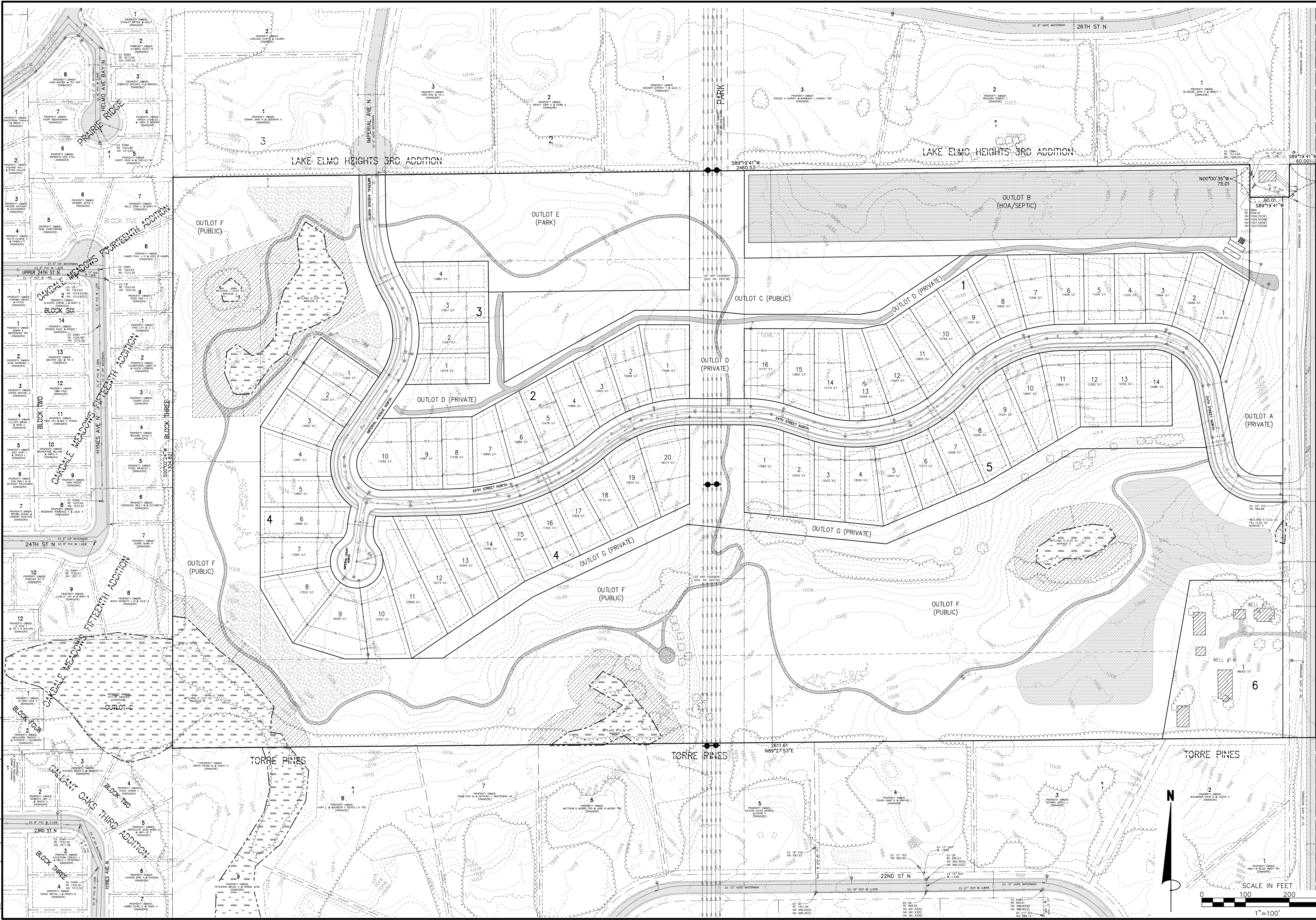
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11/8/23 REVISED LAYOUT
11/17/23 REVISED CONCEPT

CAD FILE
24110TS

PROJECT NO
24110

1.00

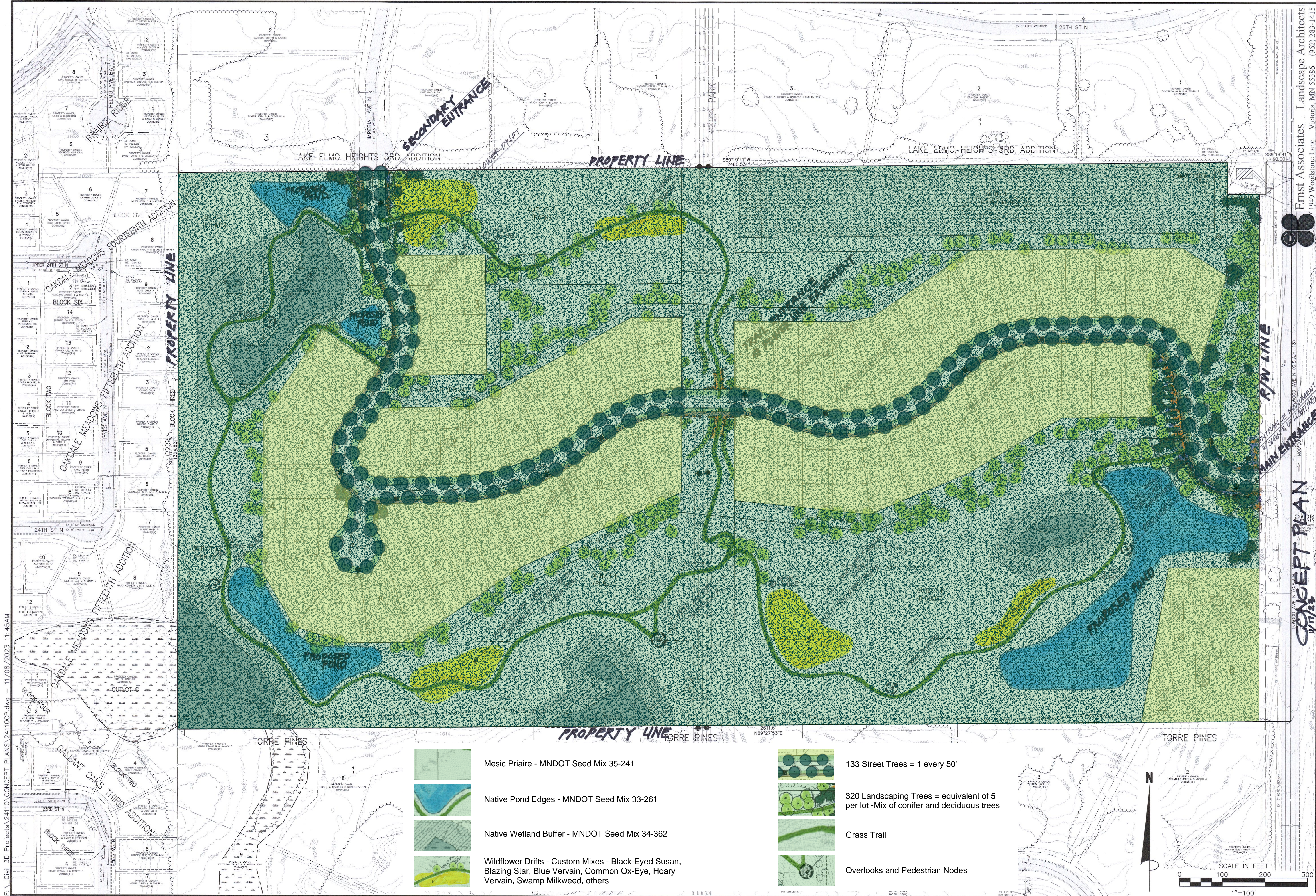


James R. Hill, Inc.
PLANNERS / ENGINEERS / SURVEYORS
2999 W. Cty. Rd. 42, Suite 100, Burnsville, MN 55306
PHONE (952)890-6044 FAX (952)890-6244

I hereby certify that this plan, specification or report was prepared by me or under my direct supervision and that I am a duly Licensed Professional Engineer under the laws of the State of Minnesota.
JAMES R. HILL, P.E.
Date: _____ Reg. No. 24576

EBERHARD PROPERTY-2298 INWOOD AVENUE N.
LAKE ELMO, MINNESOTA
SKETCH/PUD PLAN
FOR
RACHEL DEVELOPMENT
4180 NAPIER COURT NE, ST. MICHAEL, MN 55376

DRAWN BY	CJK
DATE	9/22/23
REVISIONS	
	11/8/23 REVISED LAYOUT
	11/17/23 REVISED CONCEPT
CAD FILE	24110CP
PROJECT NO.	24110
	2.00



Ernst Associates Landscape Architects
1949 Woodstone Lane Victoria, MN 55386 (952) 283-1415

James R. Hill, Inc.
PLANNERS / ENGINEERS / SURVEYORS
2999 W. Cty. Rd. 42, Suite 100, Burnsville, MN 55306
PHONE: (952) 890-6044 FAX: (952) 890-6244

I hereby certify that this plan, specification or map was prepared by me or under my direct supervision and that I am a duly Licensed Professional Engineer of the State of Minnesota.
KURT D. QUAINANCE, P.E.
Date: _____ Reg. No. 246576

EBERHARD PROPERTY-2298 INWOOD AVENUE N.
LAKE ELMO, MINNESOTA
SKETCH/PUD PLAN
FOR
RACHEL DEVELOPMENT
4180 NAPIER COURT NE, ST. MICHAEL, MN 55376

DRAWN BY
CJK

DATE
9/22/23

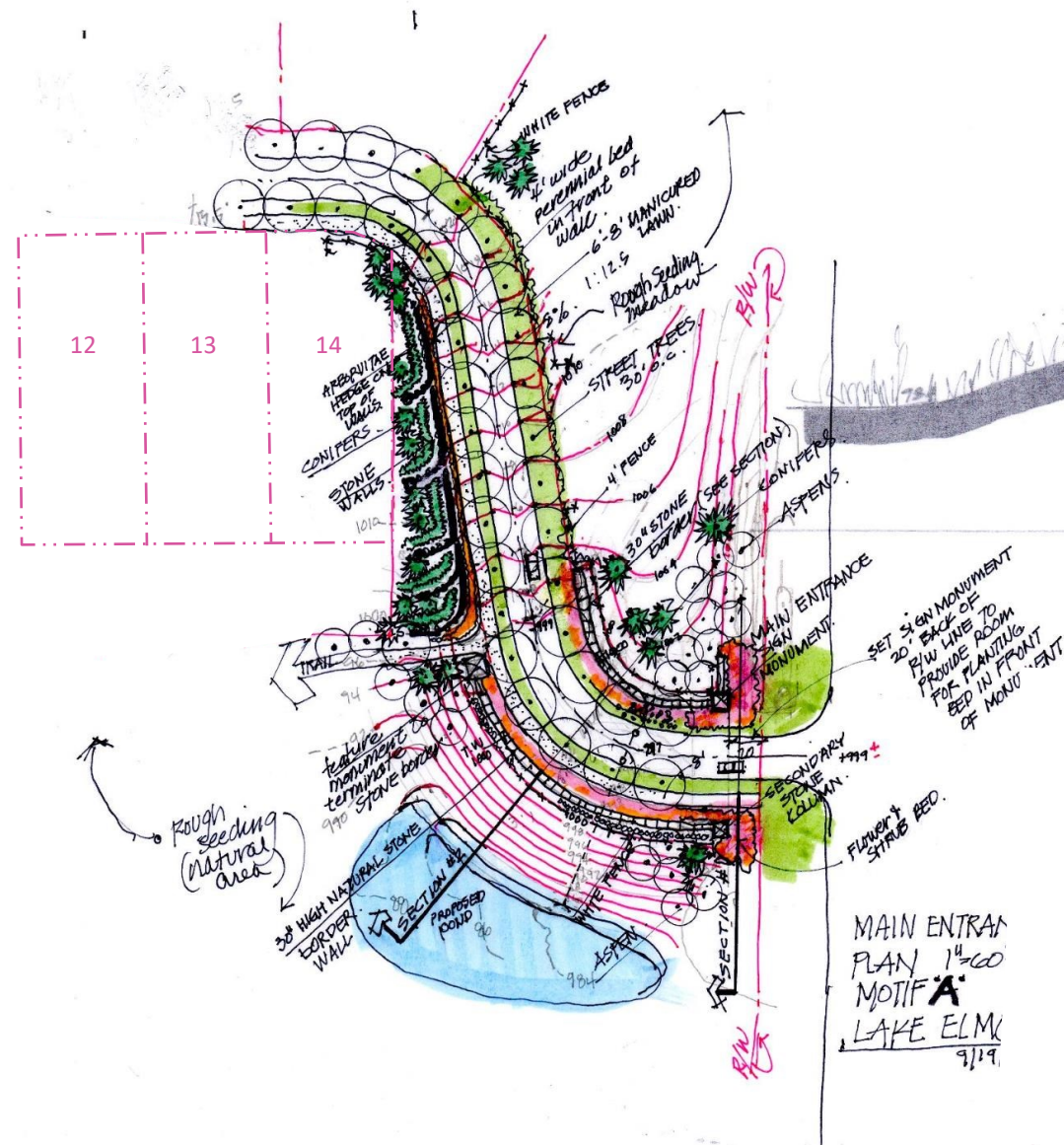
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NO.	DATE	DESCRIPTION
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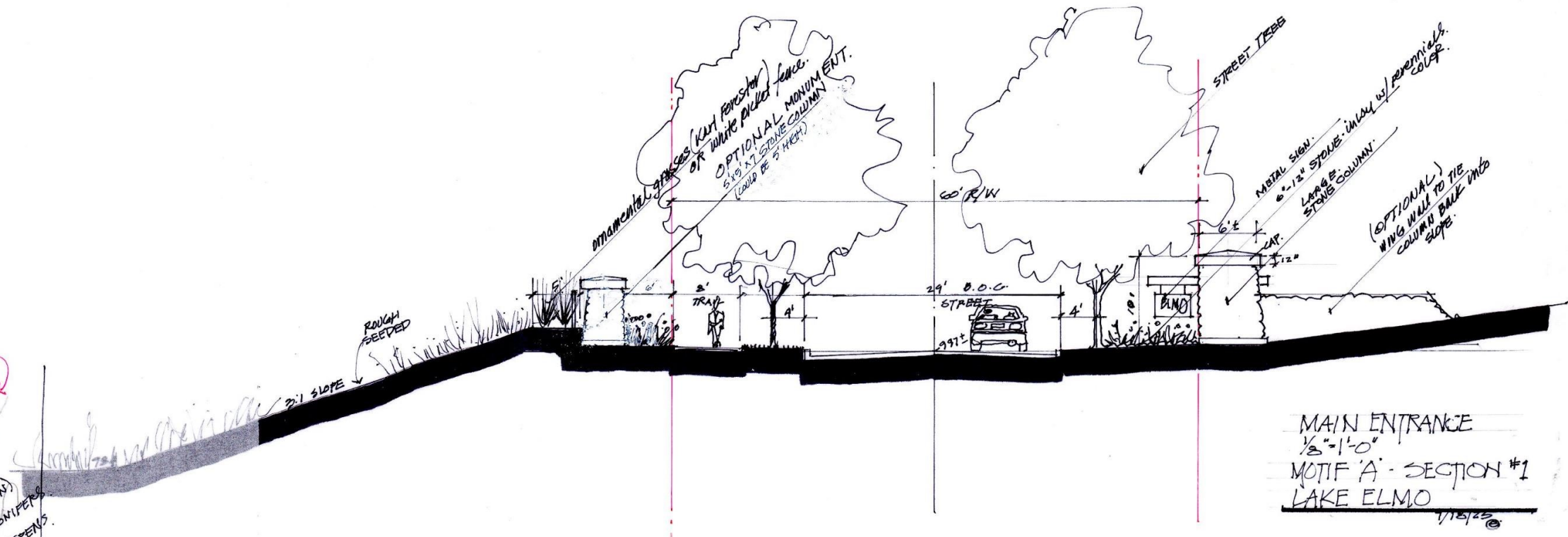
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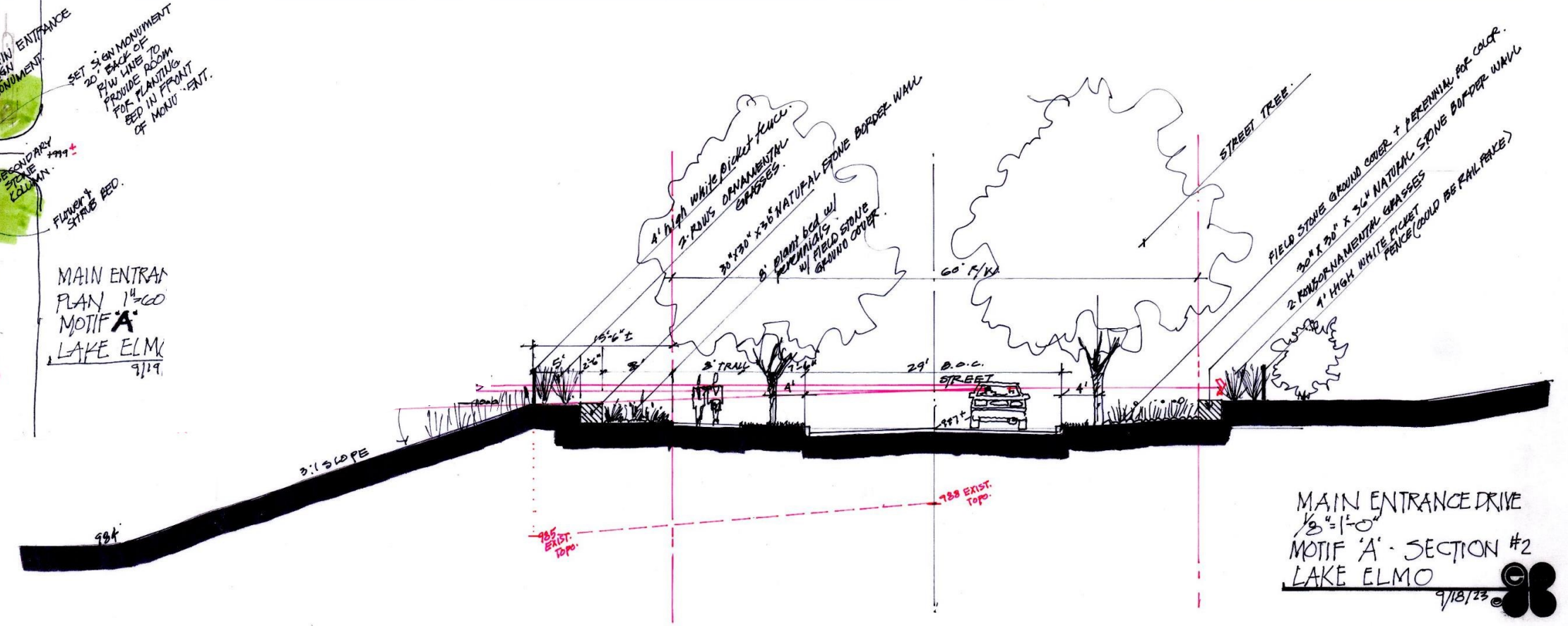
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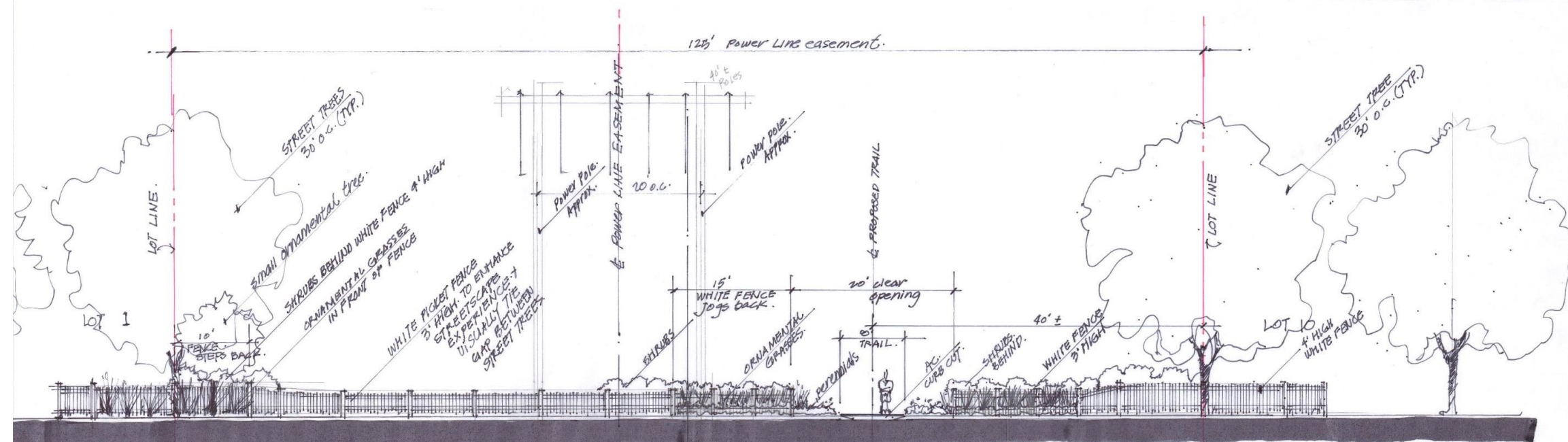
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MAIN ENTRANCE
1/8\"/>

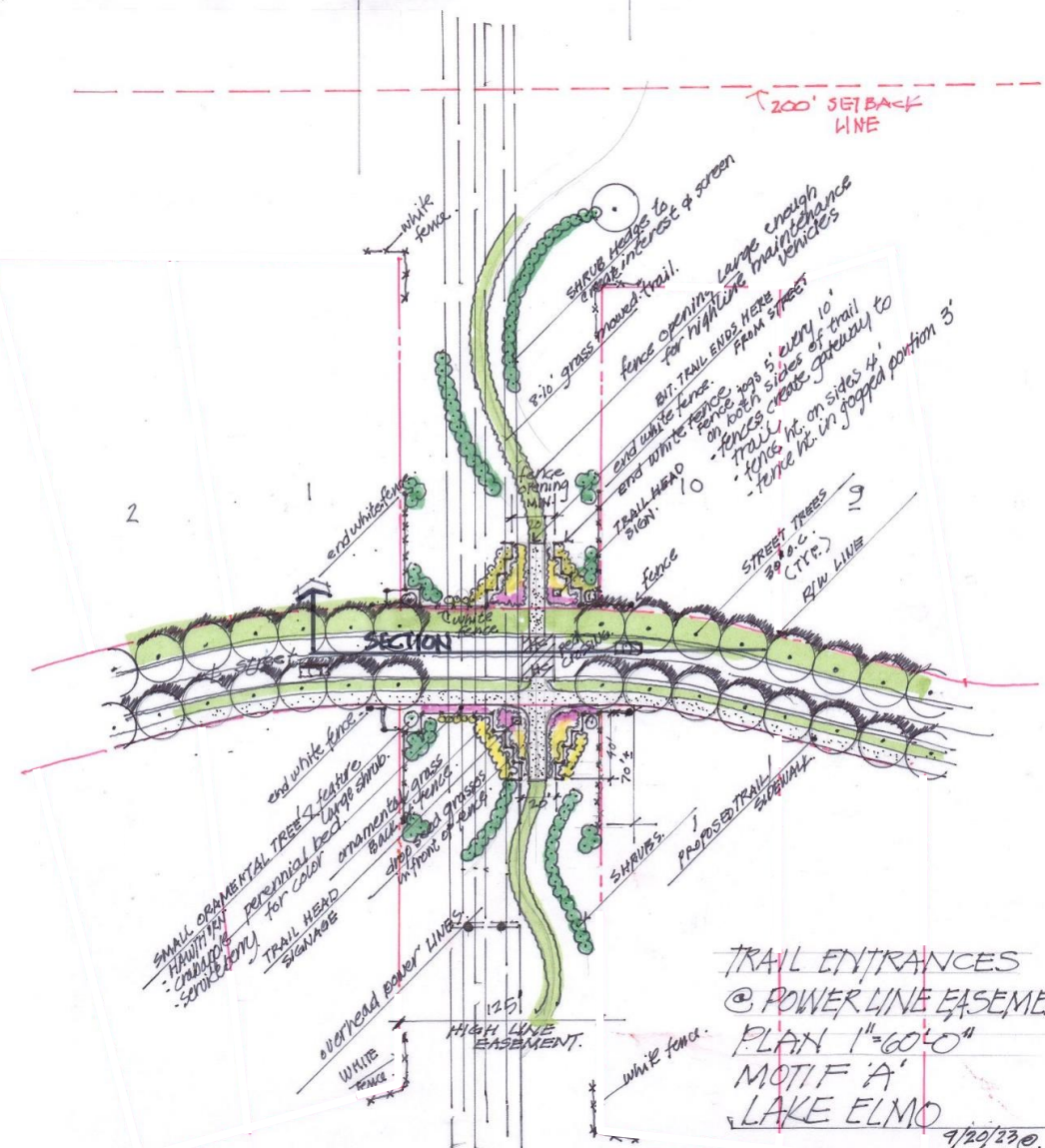


MAIN ENTRANCE DRIVE
1/8\"/>



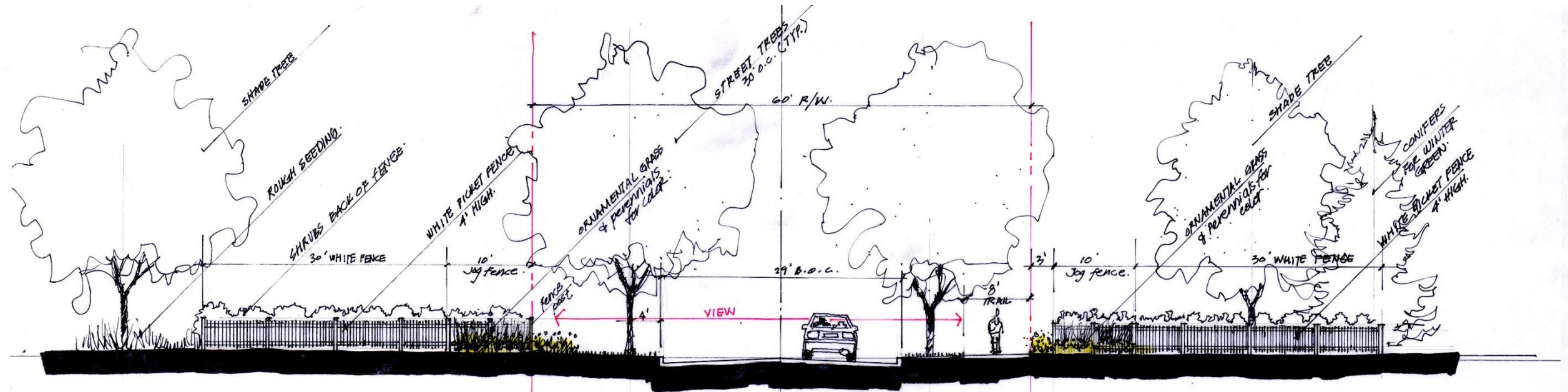
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TRAIL ACCESS SECTION
1/8" = 1'-0" MOTIF 'A'
LAKE ELMO

9/20/23 @



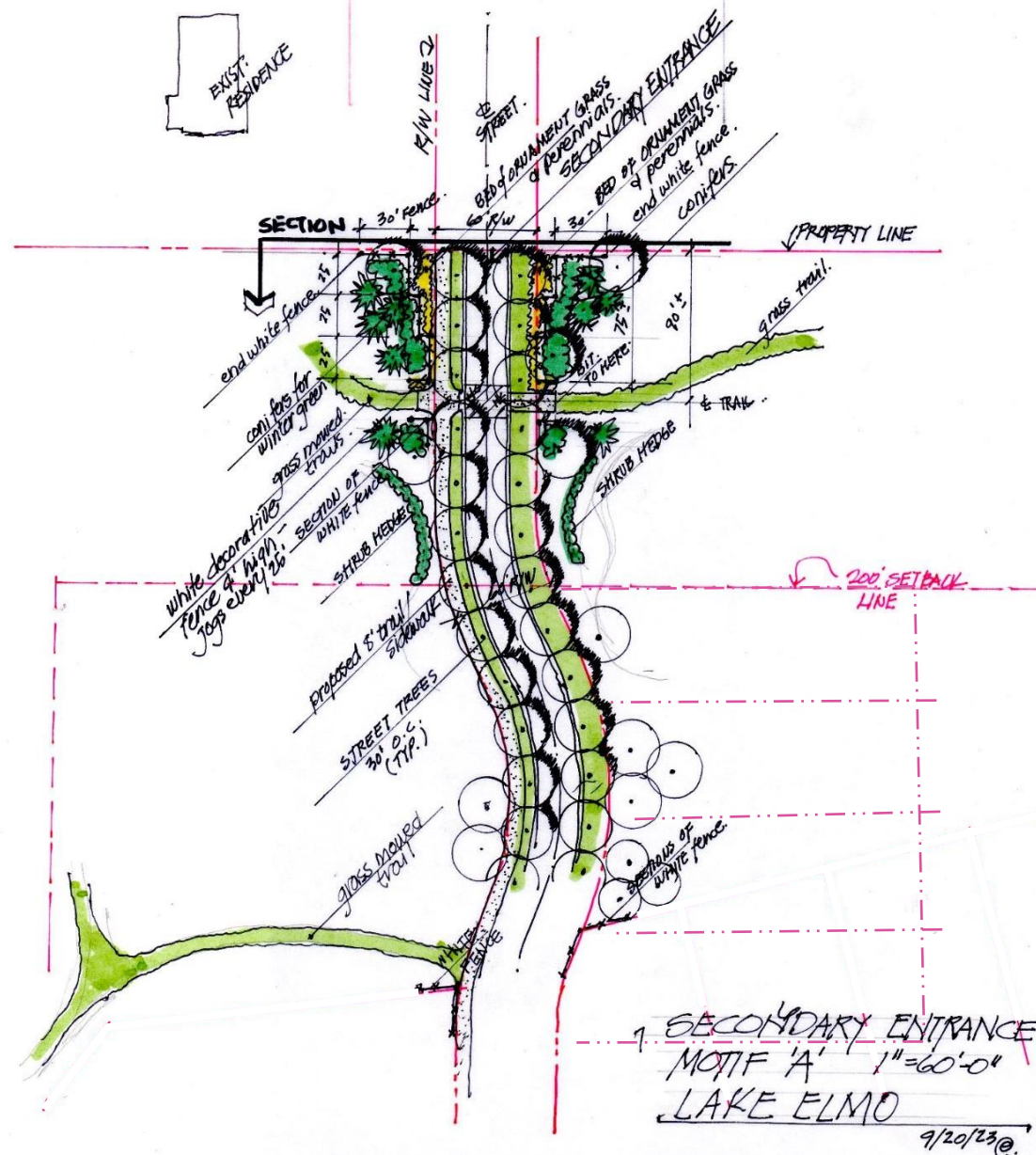
TRAIL ENTRANCES
@ POWER LINE EASEMENT
PLAN 1" = 60'-0"
MOTIF 'A'
LAKE ELMO

9/20/23 @



SECONDARY ENTRANCE
SECTION 1/8" = 1'-0"
MOTIF A
LAKE ELMO

9/20/23 ©



1 SECONDARY ENTRANCE
MOTIF A 1" = 60'-0"
LAKE ELMO

9/20/23 ©



PUBLIC WORKS

Wayne Sandberg, P.E., Director, County Engineer
Frank D. Ticknor, P.E., Deputy Director

September 15, 2023

Paul Robinson
Development Director
Rachael Development
4180 Napier Court NE
St. Michael, MN 55376

Comments on 2298 Inwood Sketch Plan

Dear Paul,

Thank you for the opportunity to review and comment on the sketch plan for the site located at 2298 Inwood located along CSAH 13. We are grateful for Rachael Development reaching out to the County to receive initial feedback on the site plan before moving forward on the project. Our development review team has reviewed the sketch plan proposal and offers the following comments.

CSAH 13 at this location is currently classified as an "A-Minor Expander" roadway. The Washington County 2040 Comprehensive Plan contains access criteria for county roads related to spacing, sight lines, and availability of local road connections. CSAH 13 requires preserving 150 feet of right-of-way for this portion of CSAH 13. The site plan will need to indicate a dedication of 75 feet of right-of-way along the parcel to meet the needs identified in the Comprehensive Plan.

Washington County access spacing guidelines for minor arterial roads is $\frac{1}{4}$ of a mile. The development proposes accessing CSAH 13 just south of Lake Elmo's booster station. The existing intersections located at 21st and 26th Streets are approximately 2400 feet apart. The ideal spacing for the site access would be for it to be located at approximately the center of this parcel. Deviation from normal access spacing can sometimes be considered in favor of other access management goals, such as removal of other access and/or locations with improved sight distance. In this instance, access near the north end of the parcel might be considered in pairing with the removal of 26th Street (conversion to cul-de-sac) and the city utility driveway from CSAH 13, along with removal of any in-place driveways or field access points along the parcel.

Access permits will be needed to construct new street connections within the county right-of-way. Based on number of units, the development will be required to construct turn lanes and connect to adjacent developments wherever stubs are provided as a condition of county road access, which in this case would be Imperial Ave. We appreciate the foresight in connecting this development to Imperial Avenue North. The plans should identify trail connections within the site and along CSAH 13.

Washington County's policy is to assist local governments in promoting compatibility between land use and highways. Residential uses located adjacent to highways often result in complaints about traffic noise. Traffic noise from this highway could exceed noise standards established by the Minnesota Pollution Control Agency (MPCA), the U.S. Department of Housing and Urban Development, and the U.S.

Department of Transportation. Minnesota Rule 7030.0030 states that municipalities are responsible for taking all reasonable measures to prevent land use activities listed in the MPCA's Noise Area Classification (NAC), where the establishment of the land use would result in violations of established noise standards. Minnesota Statute 116.07, Subpart 2a exempts County Roads and County State Aid Highways from noise thresholds. County policy regarding development adjacent to existing highways prohibits the expenditure of highway funds for noise mitigation measures. The developer should assess the noise situation and take any action outside of County right of way deemed necessary to minimize the impact of any highway noise.

A Right of Way Permit will be required for any work within the County highway right of way as it relates to the development. As the development progresses, a plan set will be required with the application and include any grading, culvert installation, water and sewer services, parallel trail development, signage, and any landscaping and other improvements within the County right of way.

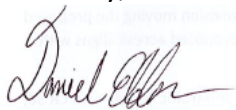
Additionally, the developer or the City will need to submit a drainage report and calculations for review of any downstream impacts to the county drainage system. Along with the drainage calculations, we will request written conclusions that the volume and rate of stormwater run-off into the county right of way will stay the same as part of the project.

All utility connections to County highway right of way for the development require Washington County Right of Way permits. Typically, these utility connection permits are the responsibility of the utility companies.

Thank you again for the opportunity to provide comments on the sketch plan for 2298 Inwood. We look forward to continuing to work with you and the City of Lake Elmo to ensure that development in this area is successful and well-served by the transportation network.

If you have any questions, please get in touch with me at 651-430-4307 or daniel.elder@co.washington.mn.us

Sincerely,

A handwritten signature in dark ink, appearing to read "Daniel Elder", is positioned below the word "Sincerely,".

Daniel Elder
Planner II

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Government Center | 14949 62nd Street North | P. O. Box 6 | Stillwater, MN 55082-0006
P: 651-430-6001 | F: 651-430-6017 | TTY: 651-430-6246
www.co.washington.mn.us

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Cc (email only):

Sophia Jensen, City Planner City of Lake Elmo

Wayne Sandberg, Public Works Director/County Engineer

Frank Ticknor, Deputy Director Public Works

Lyssa Leitner, Public Works Planning Director

Joe Gustafson, Traffic Engineer

Kevin Peterson, Design Engineer

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MEMORANDUM

Date: REVISED November 21, 2023

To: Rachel Development
From: Nathan Fuerst, Consulting Planner
Jenni Faulkner, Consulting Planner

RE: Eberhard Property – Revised Concept Review

Description of Request

The City of Lake Elmo received a Residential Subdivision and Open Space Planned Unit Development (OS PUD) Sketch Plan from Rachel Development for a project totaling approximately 78.24 acres. The subject property is located at 2298 Inwood (PID 2102921320001). The sketch plan details a subdivision with 65 single family residential units. This is revised from a previous version with 42 units, the subject of a previous Planning Review memo dated October 13, 2023.

The proposal is characterized as a major subdivision. The applicant is requesting the use of the OS PUD ordinance to allow for flexibility to City requirements and additional density in this project.

Premature Subdivisions – Lake Elmo Water Capacity Concerns

The City is working through issues relating to the amount of water which it can draw under an existing Minnesota Department of Natural Resources permit. A resolution on this issue is pending and is made more complicated due to the PFAS contaminant issue in the East Metro. Until the resolution of ongoing water issues, Lake Elmo's City Council may choose to reject new plats as premature.

Development Summary

Site Size:	78.24 -acre
Existing Zoning:	Rural Residential (RR)
Proposed Zoning District:	Open Space PUD (OP) with a Planned Unit Development Overlay (PUD)
Proposed Use(s):	Single Family Residential
Use Classification:	Single Family is Permitted OP
Existing Land Use:	Undeveloped Farmstead currently used as agricultural.

Adjacent Zoning North: Residential Estate (RE)
Designations: South: Residential Estate (RE)
East: Public Facilities (PF) Lake Elmo Park Reserve
West: City of Oakdale- Single Family Developments
Future Land Use: Rural Single Family (RSF)

Preliminary and Final PUD

Any future submittal should address the requirements of the Open Space Planned Unit development Code Article XVII and Planned Unit Development Code Article XVIII.

OS PUD Minimum Requirements (Sec. 105.12.1030)

1. Only land zoned agricultural, rural residential, or rural estate qualifies **(Met)**
2. Minimum lot area 20 acres **(Met)**
3. Single Ownership **(Met)**

OS PUD Minimum Design Requirements (Sec. 105.12.1050)

1. Density- maximum 18 units per 40 acres buildable land

The proposed development exceeds density with 64 units proposed plus the existing homestead site. City Code allows 18 units per 40 acres with an OS PUD. Density excludes wetlands and shorelands and there are 6 wetlands on site, totaling 2.58 acres. The number of units provided by the City Code is calculated below:

1. Find Net Developable Acreage :78.24 acres - 2.58 = 75.66 Net developable acres
2. Find OSPUD Density: 18 units/40 acres = 0.45 units/acre
3. Total Units Permitted: 75.66 net acres * .45 units/ net acre = 34 units

Additional density was initially discussed relative to the City's PUD ordinance which allows bonus density up to 20%. In this case, an additional 20% would provide a total of 41 units. Regardless of the number of units requested above the 34 allowed in the OSPUD ordinance, a supermajority 4/5 vote by the city council will be required to approve the added density.

RSF Land Use allows .10-2.0 units/acre. The proposed development is at .86 units/acre and is consistent with the Comprehensive Plan. With 65 units proposed, the proposed density exceeds what is allowed by zoning without additional PUD flexibility. **(Not Met – Flexibility Requested)**

2. Lot design

The applicant must show how the lots were designed with soils and buffers being the priority over lots and building pads. The following review is for whether the proposal meets the informational requirements of code, but not necessarily the standards created by the ordinance. Supermajority (4/5) vote allows City Council to permit greater flexibility than allowed in ordinance.

1. *Soils Analysis Conducted.* – Report and map are provided indicating best location for community septic based on known soils. More detail on whether Karst soils are present will be required at Preliminary Plat. **(Need Info)**
2. *Septic Design* – The project proposes a community septic system. Location(s) suitable for community drain field need to be provided on the plans **(Met)**
3. *Buffers* – 200' from adjacent residential **(Met)**
4. *Identification on preferred building pad locations* – Shown on sheet 4.00. City

Engineering review of streets will be required. **(Met)**

5. *Placement of Streets* - The proposed streets are intended to be public with a trail on one side. The County has specified where they would allow access and the City desires a connection to Imperial Avenue to the development to the north. Road through buffer is at 90 degrees to make the connection. The proposed street minimizes environmental impacts while promoting road safety. **(Met)**
6. *Lot Creation* – Lots shown on plans with smallest proposed lot at 11200 sq ft. Minimum lot size of 21,780 sq feet for lots served by communal drain fields is not met, explanation for PUD request in Narrative. Plan page 4.0 provides information on location of soils, slopes, and setbacks. **(Not Met – Flexibility Requested)**
7. *Open Space* – 50% minimum open space is required. 48.37 acres of outlot/open space are proposed and can include wetlands, and ponding. Minimum 5 acres contiguous open space. Stormwater pond to be in Outlot dedicated to the City. If existing residence counted towards density. Recommendation from Parks commission for cash in lieu of land. **(Met)**.

OS PUD Minimum Development Standards (Sec. 105.12.1060) More information needed upon Preliminary PUD/Plat submittal)

1. *Preserved Open Space* – Conservation Easement needed in the name of the City or other non-profit entity. Stormwater dedicated as outlot to the City. A plan is required which shows how the land will be returned to a natural state and who will be responsible for implementation and ongoing maintenance. City will need copy of HOA declarations as part of final PUD Plan. Must include certain provisions per this section. **(Need Info)**
2. *Septic system* - Need to meet county requirements. Communal drain field can be part of required open space with no recreational facilities within 50 feet. **(Need Info)**
3. *Building Standards* – 35' height limit, will need building elevations and minimum architectural standards submitted. **(Need Info)**
4. *Landscaping* – Applicant has requested flexibility from 10 to 5 trees per lot and from 50' to 30' of spacing for boulevard trees. **(Flexibility Requested)**
5. *Impervious Surface* – Maximum 25% overall development (outside of conservation areas). Applicant has requested flexibility to City standard but it is unclear how much is needed. Need additional detail of proposed maximum impervious surface of areas outside of conservation outlots. **(Flexibility Requested)**
6. *Trails* – Sidewalks are required on one side of the street, with trails (asphalt or concrete) the same length as all roadways also required. The sidewalk requirement is satisfied but the Applicant is proposing 5000' of grass trail instead of 3400' of asphalt/concrete trail. **(Flexibility Requested)**

PUD Minimum Requirements (Sec. 105.12.1150)

1. A PUD must include a minimum of five (5) acres **(Met, total 78 acres)**
2. For all PUDs, at least 20 percent of the project area not within street rights-of-way shall be preserved as protected open space. **(Met)**
3. In newly developing areas, streets shall be designed to maximize connectivity in each cardinal direction, except where environmental or physical constraints make this infeasible. All streets shall terminate at other streets, at public land, or at a park or other community facility. **(Met)**

Need list of proposed permitted and conditional uses, performance standards and flexibilities asked for within the PUD to be adopted as part of the PUD Ordinance

(Partially met, need uses and impervious surface per lot provided, only flexibility asked for at this stage is impervious surface and density bonus).

PUD Identified Objectives (Sec. 105.12.1130)

When reviewing requests for approval of a planned unit development, the City shall consider whether one or more of the objectives listed below will be served or achieved. It is the responsibility of the applicant to provide a narrative of how the proposed planned development meets one or more of the City's identified objectives 1 through 10. Planned unit developments should not be allowed simply for the purpose of increasing overall density or allowing development that otherwise could not be approved.

(It appears that multiple objectives are met but the narrative should be revised to include this assessment)

1. Innovation in land development techniques that may be more suitable for a given parcel than conventional approaches.
2. Promotion of integrated land uses, allowing for a mixture of residential, commercial, and public facilities.
3. Establishment of appropriate transitions between differing land uses.
4. Provision of more adequate, usable, and suitably located open space, recreational amenities, natural resource protection and other public facilities than would otherwise be provided under conventional land development techniques.
5. Accommodation of housing of all types with convenient access to employment opportunities and/or commercial facilities; and emphasized to create additional opportunities for lifecycle housing to all income and age groups.
6. Preservation and enhancement of important environmental features through careful and sensitive placement of buildings and facilities.
7. Coordination of architectural styles and building forms to achieve greater compatibility within the development and surrounding land uses.
8. Creation of more efficient provision of public utilities and services, lessened demand on transportation, and/or the promotion of energy resource conservation.
9. Establishing measures to protect and preserve groundwater storage.
10. Allowing the development to operate in concert with a redevelopment plan in certain areas of the city and to ensure the redevelopment goals and objectives will be achieved.

PUD Density (Sec. 105.12.1160)

For projects going through the standard PUD review process, up to a 20% increase in density is allowed with amenity points. In initial conversations regarding this site, staff had suggested that a density bonus go through this review. Amenity points are awarded for items above and beyond minimum code requirements and amenities cannot be counted twice if its already required by code. One point equates to 1% increase in density.

Driveways-(LEC 9.16)

Information on driveways or locations was not provided. Please submit plan site driveway locations with prelim plat. **(Need Info)**

Off-Street Parking

All off-street parking shall be in compliance with LEC 105.12.410 Off-Street Parking. Single family detached dwellings must provide 2 spaces per dwelling unit. **(Need Info)**

Signage

Section 105.12.430 regulates signage. It is recommended that future submittals include signage types, sizes, and locations for review against City requirements. **(Need Info)**

Park Land Dedication (LEC 103.00.150)

1. 5% of the land area is required for park land dedication.
2. This property is not within a park search area in the City's Comprehensive Plan. An on-road striped shoulder is shown in the Comp Plan along CR 13 for future trail purposes.
3. A location for potential future park has been provided in the plans pending recommendation from Parks Commission on park dedication requirements.
4. Staff recommends that parkland dedication obligation should be paid as a cash in lieu fee (acreage requirement x fair market value).
5. The City's Parks Commission has agreed with staff's recommendation for Cash in lieu of land dedication.

Preliminary and Final Plat

Any Future submittal should address the requirements of LEC 103.00.090 and LEC 103.00.100. and LEC 103.00.140. Major Subdivision Preliminary Plat Application Requirements are also in the application checklist available on the city's website.

Engineering

The City Engineer has provided comments in the attached memo dated November 30, 2023. Engineering considerations include dedications, "No Parking" on one side of the street due to narrower than normal r-o-w and street width, Phasing plans needed, required trails and sidewalks not being part of amenity points, and in general most of the technical information required for preliminary plat approval will need to be submitted. All plans shall be in conformance with City Engineering Design Standards 2022 as well as in compliance with other regulator entities. **(Need Info upon preliminary plat application)**

Fire Department

The Lake Elmo Fire Chief provided comments in the attached memo dated November 22, 2023. All comments must be addressed with any future submittal.

Landscaping

The Lake Elmo Landscape Architect provided comments in the attached memo dated September 29, 2023. A landscape plan and complete tree preservation plan needs to be provided with any future submittal. All comments must be addressed with any future submittal.

Washington County

The Washington County comment letter dated November 30, 2023 shall be addressed in future submittals. Comments relate to r-o-w dedication, turn lanes, existing driveways, noise impacts and potential for addressing access spacing.

Washington County Dept of Health

In an e-mail received October 12, 2023, the county is recommending testing of the discovered fill soil (SB-1) for contamination, regardless of whether they will be excavating it or not.

Valley Branch Watershed District (VBWD)

Attached are e-mailed comments revied on October 10, 2023. A VBWD Permit will be required along with necessary plan submittals. There is karst identified on site, as such related attention to stormwater locations and infiltration will be part of the review. No comments received to date. Should we receive comments, they must be addressed with any future submittal.

City of Oakdale

On November 30, 2023, the City of Oakdale provided comments suggesting a trail connection be made to allow residents from this development to access the public trails and sidewalks in that community. Residents in this part of Lake Elmo are served by School District 622.

Required Next Steps

1. Sketch plat and concept PUD review by the City Council scheduled for December 12, 2023.
2. After Council worksession and inclusion of recommended plan changes and addressing sketch plat and concept PUD comments, an application for Preliminary Plat and PUD can be made.

Feel free to contact me with any questions about the City review of this concept or to discuss any other matters regarding property improvements.



Nathan Fuerst
Consulting Planner
(612) 210-8150
Nathan.fuerst@bolton-menk.com

MEMORANDUM

FOCUS ENGINEERING, inc.

Cara Geheren, P.E. 651.300.4261
Jack Griffin, P.E. 651.300.4264
Ryan Stempski, P.E. 651.300.4267
Chad Isakson, P.E. 651.300.4285

Date: November 30, 2023

To: Sophia Jensen, City Planner
Cc: Nathan Fuesrt, Planning Consultant
Marty Powers, Public Works Director
Chad Isakson, PE, Assistant City Engineer
From: Jack Griffin, PE, City Engineer
Re: Eberhard OP (Rachel Development) Sketch Plan

An engineering review has been completed for the Eberhard OP Sketch Plan (2298 Inwood Avenue) received on November 20, 2023. The submittal consisted of the following documentation:

- Sketch Plan Narrative dated November 17, 2023.
- Sketch Plan/PUD Exhibits dated November 17, 2023.
- Landscape Plan dated November 8, 2023.
- Preliminary Geotechnical Exploration Report, dated May 20, 2022.
- Wetland Delineation Report, dated November 10, 2022.

1. All public improvements constructed to support the development must be constructed in accordance with the City Engineering Design Standards Manual dated January 2022.

STREETS AND TRANSPORTATION

1. Inwood Avenue Right-of-way dedication. Right-of-way dedication will be required as part of the Plat including 75 feet as measured from the existing roadway centerline. Right-of-way dedication has been shown on the Sketch Plan as required.
2. Access Management. Site access is shown from a new street extending west into the subdivision from Inwood Avenue (CSAH 13). Washington County has reviewed and approved the access point, shown approximately at the center of the parcel. County review comments are dated September 15, 2023.
3. Inwood Avenue (CSAH 13) Improvements. The development will be responsible to make improvements to Inwood Avenue at developer's sole cost. Improvements will include right and center left turn lanes at the intersection of the new local street consistent with Washington County Standards.
4. Secondary access to the site is required for residential units exceeding 30 homes. Secondary access will be accomplished through a connection to Imperial Avenue, connecting into the existing Lake Elmo Heights residential neighborhood.
5. Phasing Plan. The development phasing will require the secondary connection to Imperial Avenue to be operational before the 31st building permit will be issued. Access for the initial phases of development should be prohibited from Imperial Avenue to avoid construction traffic through the existing Lake Elmo Heights neighborhood. Temporary cul-de-sacs meeting City design standards will be required as the development is phased.
6. A public street is proposed on the Sketch Plan with a 28-ft wide street within a 60-ft right-of-way. City design standards currently require a 32-ft wide street within a 66-ft right-of-way to allow parking on both sides. For low density open space developments, the city has allowed for a 28-ft wide street within a 60-ft right-of-way with parking permitted on only one side of the street, however the lot frontage and density

proposed for this development, if approved as presented, is more similar to the city's MUSA area residential developments.

7. All streets must be designed to meet the City's Engineering Design Standards, including street cross slopes, boulevard grades and utility easement grades. Surmountable concrete curb and gutter shall be installed along the frontage of properties with future driveways and B618 curb installed along entrance roadways.
8. Street intersections must connect at 90 degrees and maintain 50 feet of tangent with maximum slopes of 2.5%. The cul-de-sac (Imperial Court North) intersection with 24th Street North must be revised accordingly, and the intersection relocated to provide proper sight lines. Residential maximum longitudinal grade is 6%. All cul-de-sacs must meet City design standards for minimum diameter of 90 feet, minimum right-of-way diameter of 120 feet, and signed "No parking" throughout.
9. A right turn lane will be required along 24th Street North at Inwood Avenue (CSAH 13).
10. The street connection to the Lake Elmo Heights neighborhood at Imperial Avenue will require the removal of the existing cul-de-sac.
11. City design standards require a six (6) foot sidewalk along all residential streets. The Sketch Plan shows an 8-ft bituminous trail in place of the sidewalk. If the trail replacement is approved by the City, the trail should be in addition to the required sidewalk.
12. Trail Requirements. The Open Space PUD ordinance requires a trail system to be established equal in length to the sum of the centerline length of all public roads within the development. The Sketch plan provides this trail as required; however, it is being proposed instead of the required sidewalk.
13. Ten (10) foot utility easements are required on either side of all public right-of-way. The 10-ft. easement corridor must be preserved for the installation of small/dry utilities and remain free from all encroachments, and graded to a maximum 4% grade per city detail 805.
14. Driveways. No driveways were shown as part of the Sketch Plan. All driveways must be installed in accordance with all city ordinances, including minimum distance from intersections, driveway angles installed at 90-degrees as they cross public right-of-way, and distance between driveways. Revisions to the lot layouts may be necessary for driveway compliance.

STORMWATER MANAGEMENT/GRADING

1. The proposed development is subject to a Stormwater Management Plan (SWMP) meeting State, Valley Branch Watershed District (VBWD) and city rules. A VBWD permit is required. Storm water facilities proposed as part of the development to meet State and watershed permitting requirements must be constructed in accordance with the City Engineering Design Standards Manual dated January 2022.
2. The SWMP will be required to verify that rate control and volume control requirements are met for all points of discharge from the site. The existing and proposed drainage exhibits must clearly show and label all points of discharge from the site, including any required public improvements and turn lanes. The SWMP rate control tables must reference each discharge location independently and combined.
3. All storm water basins must be placed in Outlots dedicated to the city. The Outlot must fully incorporate the 100-year HWL, 10-foot maintenance bench and all maintenance access roads. Maintenance access roads meeting city standards must be provided for all storm water facilities and structures. All adjacent lot corners must be +.2 ft above the 100-year HWL to meet construction tolerance and maintain HWL on each Outlot. Storm water ponding, including the 100-year HWL, may not encroach adjacent roadway right-of-way, or adjacent sanitary sewer or watermain utility easement corridors.
4. Overland emergency overflows or outlets will be required as part of the site plan.
5. All wetlands and wetland buffers must be protected by easement and may not encroach individual lots.
6. Minimum floor elevations must be at least 2 feet higher than the adjacent 100-year HWL elevation. Also, all low opening elevations for all buildings must be at least 1-ft higher than any adjacent emergency overflow elevation (EOF).
7. All localized low points must be protected within a drainage easement.
8. Stormwater Reuse System. The project Narrative indicates that the developer intends to install a stormwater irrigation reuse system. If the reuse system is proposed as part of the watershed permitting requirements, the stormwater reuse system must be provided in accordance with city design standards.

9. The storm sewer system shall be designed to meet all City design standards including RCP pipe materials and maintaining the minimum pipe cover of 3 feet. Drain tile is required as part of the city standard street section at all localized low points in the street. Drain tile considerations may impact the storm sewer design and depth requirements at low points. Per city requirements all storm sewer pipe easements must be a minimum 30-feet in width.

MUNICIPAL WATER SUPPLY

1. Connection to the municipal water system is available near the proposed development in two locations. The applicant will be responsible for connecting to the existing 16-inch trunk watermain located along Inwood Avenue (CSAH 13). An 8-inch ductile iron watermain will need to be extended along the new street into and throughout the development at developer's sole cost, and to serve each proposed parcel in the Subdivision. Use of private wells is not recommended due to the ongoing groundwater contamination issues in the area.
2. Second connection point to the existing watermain system is required to create a looped watermain system, connecting to the existing 8-inch watermain located along Imperial Avenue in the adjacent Lake Elmo Heights neighborhood. This secondary connection will require the installation of a pressure reduction valve (PRV) as the Lake Elmo Heights neighborhood is located in the intermediate pressure zone while the Eberhard OP parcel is located in the high-pressure zone.
3. No watermain oversizing is applicable for this development. All watermain to be installed would be required to meet the minimum 8-inch design standard.
4. The developer will also be responsible to place hydrants and water system valves internal to the site as determined by the Lake Elmo Public Works Director and Fire Department.
5. The Sketch Plan narrative requests the use of PVC watermain. This exception is not recommended by engineering and Public Works. If PVC watermain is permitted by the city, the PVC watermain standards, including city standard details, plan notes, and specifications must be created by city staff and consultants for use by the developer. Development of new watermain standards may result in delays to the subdivision design and construction schedule.
6. When not located within the public right-of-way, minimum 30-foot easements centered over the pipe/hydrant are required without encroachments from retaining walls, trees, other small/dry utilities, or storm water management BMPs. Easements must be dedicated to the city as part of the plat. Dedicated watermain easements must be shown on all site, grading, utility, and landscape plans.

WATEWATER MANAGEMENT / SANITARY SEWER

1. The proposed development is located outside of the city designated Municipal Urban Service Area (MUSA) for sanitary sewer service. The developer is therefore responsible to provide wastewater management infrastructure to support the proposed development in perpetuity, including professional management of the system. All sewer infrastructure must be provided at the developer's sole cost and will remain privately owned and maintained.
2. A Communal Septic System is proposed to be located in the 200 ft. buffer area in the northeast quadrant of the site. A community wastewater treatment system serving 65 Lots would exceed a 10,000 gpd capacity and would therefore require a NPDES permit and be regulated through the MPCA.
3. Preliminary Plans, when submitted, must provide design details showing both a primary and secondary community drain field, each adequality sized to serve all proposed Lots. Septic system dimensions, areas and setbacks must be shown on the plat and plans, including 10-feet from all property lines and 20-feet from all structures. Setbacks must be dimensioned and labeled on the plans. Septic systems must also remain fully outside of all easement areas including the 10-foot small utility corridors along the dedicated street rights-of-way, and including all 100-year HWL from adjacent storm water ponds and from the stormwater drainage pathways.
4. The city will require the private sanitary sewer collection system to be constructed as a gravity sewer system meeting city design standards even though it will remain privately owned and maintained. All sanitary sewer manholes must be located at the street centerline. Additional manholes may be required accordingly.



PUBLIC WORKS

Wayne Sandberg, P.E., Director, County Engineer
Frank D. Ticknor, P.E., Deputy Director

November 30, 2023

Sophia Jensen
City Planner
City of Lake Elmo
3880 Laverne Avenue
Lake Elmo, MN 55042

Comments on Revised 2298 Inwood Sketch Plan

Dear Sophia,

Thank you for the opportunity to review and comment on the sketch plan for the site at 2298 Inwood, located along CSAH 13. Our development review team has reviewed the sketch plan previously, and the following letter has been updated based on the resubmitted sketch plan proposal dated 11-17-2023 and offers the following comments.

Washington County access spacing guidelines for minor arterial roads is $\frac{1}{4}$ of a mile. As such, the County recommends the existing driveway located at 2298 Inwood Drive be removed and access relocated to the proposed new street for the development. The County wishes to thank Rachel Development for considering the County comments and changing the access location. In addition to that access location, the County would also support access near the north end of the lot paired with the removal of 26th Street (conversion to cul-de-sac) and the city utility driveway from CSAH 13, along with the removal of any in-place driveways or field access points along the parcel. The County is open to discussing this with the city and developer as the project progresses.

CSAH 13 at this location is currently classified as an "A-Minor Expander" roadway. The Washington County 2040 Comprehensive Plan contains access criteria for county roads related to spacing, sight lines, and availability of local road connections. CSAH 13 requires preserving 150 feet of right-of-way for this portion of CSAH 13. The site plan will need to indicate a dedication of 75 feet of right-of-way along the parcel to meet the needs identified in the Comprehensive Plan.

The development originally proposed accessing CSAH 13 just south of Lake Elmo's booster station. The existing intersections located at 21st and 26th Streets are approximately 2400 feet apart. The ideal spacing for the site access would be for it to be located at approximately the center of this parcel. Deviation from normal access spacing can sometimes be considered in favor of other access management goals, such as the removal of other access and/or locations with improved sight distance. In this instance, access near the north end of the parcel might be considered in pairing with the removal of 26th Street (conversion to cul-de-sac) and the city utility driveway from CSAH 13, along with removal of any in-place driveways or field access points along the parcel.

Access permits will be needed to construct new street connections within the county right-of-way. Based on number of units, the development will be required to construct turn lanes and connect to adjacent

developments wherever stubs are provided as a condition of county road access, which in this case would be Imperial Ave. We appreciate the foresight in connecting this development to Imperial Avenue North. The plans should identify trail connections within the site and along CSAH 13.

Washington County's policy is to assist local governments in promoting compatibility between land use and highways. Residential uses located adjacent to highways often result in complaints about traffic noise. Traffic noise from this highway could exceed noise standards established by the Minnesota Pollution Control Agency (MPCA), the U.S. Department of Housing and Urban Development, and the U.S. Department of Transportation. Minnesota Rule 7030.0030 states that municipalities are responsible for taking all reasonable measures to prevent land use activities listed in the MPCA's Noise Area Classification (NAC), where the establishment of the land use would result in violations of established noise standards. Minnesota Statute 116.07, Subpart 2a exempts County Roads and County State Aid

Highways from noise thresholds. County policy regarding development adjacent to existing highways prohibits the expenditure of highway funds for noise mitigation measures. The developer should assess the noise situation and take any action outside of County right of way deemed necessary to minimize the impact of any highway noise.

A Right of Way Permit will be required for any work within the County highway right of way as it relates to the development. As the development progresses, a plan set will be required with the application and include any grading, culvert installation, water and sewer services, parallel trail development, signage, and any landscaping and other improvements within the County right of way.

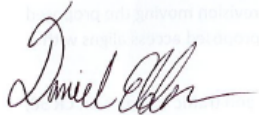
Additionally, the developer or the City will need to submit a drainage report and calculations for review of any downstream impacts to the county drainage system. Along with the drainage calculations, we will request written conclusions that the volume and rate of stormwater run-off into the county right of way will stay the same as part of the project. Confirmation that the developments stormwater plan meets all watershed requirements will be required prior to any permit approvals.

All utility connections to County highway right of way for the development require Washington County Right of Way permits. Typically, these utility connection permits are the responsibility of the utility companies.

Thank you again for the opportunity to provide comments on the revised sketch plan for 2298 Inwood. We look forward to continuing to work with you and the City of Lake Elmo to ensure that development in this area is successful and well-served by the transportation network.

If you have any questions, please get in touch with me at 651-430-4307 or
daniel.elder@co.washington.mn.us

Sincerely,

A handwritten signature in dark ink, appearing to read "Daniel Elder". The signature is fluid and cursive, with the first name "Daniel" being more prominent than the last name "Elder".

Daniel Elder
Planner II

Cc (email only):

Wayne Sandberg, Public Works Director/County Engineer
Frank Ticknor, Deputy Director Public Works
Lyssa Leitner, Public Works Planning Director
Joe Gustafson, Traffic Engineer
Kevin Peterson, Design Engineer

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LAKE ELMO FIRE DEPARTMENT – OFFICE OF THE FIRE MARSHAL

Fire Prevention, Code Enforcement, and Public Education



November 22, 2023

Sophia Jensen, Planner
City of Lake Elmo

Re: Eberhard Development Sketch Plan Review

Prepared by: Anthony Svoboda, Fire Marshal

Approved by: Dustin Kalis, Fire Chief

Applicable Codes:

- 2020 Minnesota State Fire Code
- 2020 Minnesota State Building Code
- Lake Elmo Fire Department Fire Code Policies
- NFPA 13, 2016 edition
- NFPA 13D, 2016 edition

Fire Department Comments:

- 1) All roads and drive lanes shall meet the Lake Elmo Fire Department requirements for widths and turning radiuses
- 2) Approved fire apparatus roads shall be provided and maintained throughout all development phases in coordination with engineering, public works, planning, and fire departments.
- 3) Construction phasing shall be compliant with the Minnesota State Fire Code for fire department access throughout the development. Phasing that includes more than 30 residential units requires two separate means of emergency access at all times of the development.
- 4) Street names and addressing shall be consistent with the Washington County Uniform Street Naming and Property Numbering System. *Names proposed in the sketch plan document are acceptable.*
- 5) On-street parking shall be provided in approved locations following review by Engineering and Public Works.
- 6) An approved signage and marking plan shall be determined for all No Parking and Fire Lane access roads.
- 7) Fire hydrants shall be provided in approved locations following review by Engineering and Public Works.
- 8) Building address numbers shall be plainly visible from the street fronting the property and shall contrasting color from the background.

Questions, clarifications, or the request to provide code documents can be made using the contact information listed below.

Respectfully,

Anthony Svoboda



Anthony Svoboda | Assistant Chief
Lake Elmo Fire Department
Fire Station #1 - 3510 Laverne Ave N. | Lake Elmo, MN | 55042
651-747-3907 office | www.lakeelmo.org

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LAKE ELMO FIRE DEPARTMENT – OFFICE OF THE FIRE MARSHAL

Fire Prevention, Code Enforcement, and Public Education



“Proudly Serving Neighbors and Friends”

From: [John P. Hanson](#)
To: [Sophia Jensen](#); "jack.griffin@focusengineeringinc.com"
Subject: RE: Lake Elmo Land Use Review - September 1st Batch
Date: Tuesday, October 10, 2023 10:50:41 AM
Attachments: [image002.png](#)
[image003.jpg](#)

Caution: This email originated outside our organization; please use caution.

Sophia,

Stantec submitted a Valley Branch Watershed District permit application for the Bridgewater Village project last week. It will be reviewed and if it's complete and shows compliance to VBWD rules and regulations, the request will be on the October 26 VBWD meeting agenda. I have concerns about the high amount of impervious surfaces proposed. The site drains through Easton Village, Northport, and eventually to landlocked Downs Lake. Downs Lake is very sensitive to additional stormwater runoff and so this proposed development must manage its runoff to not exacerbate flooding. That could mean a reduction in proposed impervious surface amounts on the site so less runoff is generated and more area is available for irrigation and/or other stormwater management.

I have talked with representatives of the Rachel development site, but a VBWD permit application has not yet been submitted. A VBWD permit is required. Once a VBWD permit application is submitted, we'll review it for conformance to the VBWD's stormwater runoff rate and volume management, wetland and vegetative buffer, erosion control, and floodplain and minimum floor elevation rules and regulations. Some of this site drains north to Raleigh Creek and some drains south to Farney Creek. Both creeks flow to Eagle Point Lake, which has an outlet that ultimately carries water to the St. Croix River. As included in the submittal to the city, the DNR has mapped the area as having karst. The [Construction Stormwater General Permit](#) (developed by the MPCA under MR 7090) prohibits infiltration of treated stormwater within 1,000 feet upgradient or 100 feet downgradient of karst. For other sites within VBWD that the DNR has mapped as karst, some developers have hired geotechnical consultants to determine whether the area is truly karst and if stormwater runoff could be infiltrated. Whether the area is karst or not, development at this site must provide stormwater volume control. Capturing stormwater runoff and using it for irrigation could be done for stormwater runoff volume control if infiltration is prohibited. To meet VBWD's volume control rule by only using harvesting stormwater runoff and irrigation, sites need to have enough irrigatable area. Sites that have approximately 55% irrigatable area often meet the requirement.

John

John P. Hanson, PE
Valley Branch Watershed District Engineer